

ANALYSIS OF THE FIRST YEAR IMPLEMENTATION OF
THE COMMUNITY ELIGIBILITY PROVISION OF
THE HEALTHY HUNGER-FREE KIDS ACT
IN KANSAS

By

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ABSTRACT

This study examines the implementation year of the Community Eligibility Provision (CEP) of the Healthy Hunger-Free Kids Act of 2010 within the state of Kansas. This examination will involve the impact of electing to use the Community Eligibility Provision on local educational authorities and food service departments, but will also examine local educational authority's decisions not to participate in the Community Eligibility Provision despite being eligible to participate. We will use USDA data to determine if implementation results in Kansas mirrors that of earlier implementing states, and will use participation and financial data reported by local educational agencies to gage CEP impact. Our findings indicate that local educational agencies that elected to utilize the Community Eligibility Provision saw an average increase in breakfast participation of 6.5%, an average increase in lunch participation of 3.4%, and an average increase in daily state and federal reimbursement of 4% per meal. In Kansas, the greatest reason cited for electing to not participate the Community Eligibility Provision was concern over the potential loss of state At-Risk funding due to not having necessary individual household income information.

INTRODUCTION

For many families across the country who struggle with food security, the meals provided by their local public school district are the most nutritious and reliable food source available for their children. In schools that participate in the National School Lunch Program (NSLP), families have the option of applying for free or reduced priced meals based on their family's income and household size. Over 100,000 schools across the country participate in the NSLP. These schools serve approximately 31 million children lunch each day. In these schools, households in which gross income falls below 130 percent of the federal poverty level qualify for free meals, while households in which gross income is between 130-185 percent of the federal poverty level qualify for reduced priced meals (Services, 2013).

Despite having the option of qualifying for free or reduced price meals, many families struggle to pay for the reduced meal fees (which cannot exceed \$.40 per lunch and \$.30 per breakfast). Some families, although they would qualify, do not apply for child nutrition program benefits, and struggle to pay for or provide meals for their children. Many times, these families end up with negative account balances, which must eventually be collected by the school district. Collection procedures take time, cost money, and often leave children standing in the lunch line waiting and wondering if their parents remembered to put money into their lunch accounts. Most districts have implemented a charge limit on meal accounts, in order to limit the number of accounts that are in arrears. When an account charge limit is reached the child is often denied a meal, or given a cheaper (and less nutritionally balanced) meal, such as crackers, cheese, and milk. For these children, standing in the lunch line becomes a time of trepidation and fear, as they hope that a parent or caregiver has deposited even a small amount of money in their meal account so that they can eat that day. It is for these children, the ones that often fall through the

cracks for a variety of reasons beyond their control, that the Community Eligibility Provision was created.

School year 2014-2015 was the first year that the Community Eligibility Provision (CEP) was available to Kansas schools. Like any new school initiative, CEP was greeted with great hope for the benefits it would offer to Kansas students, but also faced a myriad of challenges. The goal of this research is to examine outcomes of the implementation year of CEP in Kansas and compare that to outcomes that have been documented in other states throughout the nation.

HISTORY

At this point in our nation's history, children eating meals at school is neither news-worthy nor innovative. However, school meal initiatives, their challenges, and program changes continue to make the news on a regular basis. Before examining the most recent changes to the National School Lunch Program, it is necessary to understand a bit about the program's history and how it has changed. Combination child nutrition and education programs date back to the 1790's in Germany. In Paris in 1879, the city council approved subsidies that allowed for poor children to have access to school meals without having to pay. Other similar initiatives were taking place in England, Holland, Switzerland, and elsewhere across Europe in the early 20th century.

(Gunderson, 2014)

As school reform began to take shape in America in the early 20th century, so too did the public cries for the feeding of America's children in the public schools. Many of the political and social changes that occurred during the Progressive Era laid the ground work for the legislation that is now the only comprehensive food program aimed at school-aged children. This influence began in the 1880's as an industrial depression caused commodity prices to

become undervalued, which pushed farmers to organize and form the Farmer's Alliance. This political organization was one of the first major efforts by farmers across the nation to attempt to use their power to push for legislation that promoted their interests (Goodwyn, 1978). It was this Farmer's Alliance that set the stage for the lobbying groups that eventually persuaded the government to buy commodity foods and use them for school meal service, which, as we will see, became in the single largest factor pushing the creation of the National School Lunch Act of 1946. As outlined in Susan Levine's book, *School Lunch Politics: The Surprising History of America's Favorite Welfare Program*, school lunch looked very different in the late 19th century than it does today. However, as scientists learned more about food and nutrition, new ideas about social policy, children and hunger began to take root. During this time, a scientist named Wilbur Atwater conducted research that lead him to suggest that it was nutrients, not any specific food, that were vital to proper growth and development. Along with this idea, other scientists in the 1880's established that foods are made up of three different categories, carbohydrates, fats, and proteins. From this new field of nutrition science came other discoveries and theories that would shape food policy to this day.

Atwater also discovered specific vitamins within foods, and proposed substitution theory by showing that beans or eggs could provide the same amount of protein as meats. This substitution theory demonstrated that nutritious foods did not necessarily need to be expensive. One negative aspect of the development of nutrition science is that it helped fuel the idea that poverty, malnutrition and social inequality were due to mismanagement of finances, rather than due to a lack of financial resources (Levine, 2008). Political debates, regarding which children deserve financially subsidized meals and how much a healthy meal should cost, have been an

ongoing part of the school lunch program, and arguments using discoveries from this era are still prevalent to this day.

School meals that were served in the 1890's were unregulated and prepared by charity workers and mother's clubs (Levine, 2008). At this time, primary school was nearly universal, but secondary school was still considered an elite institution (Pamela Barnhouse Walters, 1988). However, across the United States, many facets of life were rapidly changing. For example, by the 1890's, 75% of all of the nation's wealth was concentrated in urban areas, and was continuing to increase (Billings, 1966). Urbanization was a huge factor in the changes that were beginning to occur in the educational system. For example, more children of similar ages in the cities meant that schools were able to group children based on their ages (Tyack, 1974). Also, Chicago sociologist Louis Wirth has suggested that with larger cities came a loss of the feeling of community (Rury, 1985). This may have contributed to the need for school meals to shift from community organizations, such as mother's clubs, to something more universal and non-community based.

Throughout the progressive era, school enrollment rose significantly. It is likely that it was the increase in secondary school enrollment during this time that significantly impacted the push for school meals. During the progressive era, secondary school enrollment grew over 700% (Mintz, 2004). There are many theories as to why it was during this time that school enrollment increased. In rural areas, sending kids to school provided a common social connection for the small communities (Rury, 1985). At the time, in rural areas, there was a strong, Protestant and Republican push for nation building (Meyer, 1979). Also, the mechanization of many agricultural tasks changed the amount of work on the farms, allowing for more time for children to be in school (Guest, 1985). In urban areas, researchers have

found that enrollment in secondary schools increased when blue collar jobs for older children were not available. This is considered the warehousing function of schools of this time (Grubb, 1982). This warehousing function was not seen as readily in rural areas, because the work cycle of agriculture allowed for children to attend school at various seasons throughout the year, when they were not doing farm work. In comparison, urban children, when working, were generally employed year-round, making school attendance more difficult (Rury, 1985). As the progressive era drew to a close, some researches credit the shift from a family-wage economy (where everyone in the family has to contribute to the family's income) to a family consumer economy (where children's income wasn't as necessary for a family's financial survival) (Scott, 1978). Others contend that the invention of the term "high school dropout," which developed during the progressive era, had an important social influence that caused many more students to stay in school until graduation (Lassonde, 1998)

As more children entered the school system, adults began to argue that good nutrition was needed in order for educational goals to be achieved. Author Robert Hunter summed up the argument for school meals well in his 1904 book *Poverty*:

“Learning is difficult because hungry stomachs and languid bodies and thin blood are not able to feed the brain. The lack of learning among so many poor children is certainly due, to an important extent, to this cause. ..It is utter folly, from the point of view of learning, to have a compulsory school law which compels children, in that weak physical and mental state which results from poverty, to drag themselves to school and to sit at their desks, day in and day out, for several years, learning little or nothing. It is a matter of principle in democratic America that every child shall be given a certain amount of instruction; let us render it possible for them to receive it, as monarchical

countries have done by making full and adequate provision for the physical needs of the children who come from the homes of poverty.” (Hunter, 1965)

Other researchers and authors of the time were echoing Hunter’s cries regarding the desperate need for child nutrition programs for those in poverty. According to John Spargo’s *The Bitter Cry of the Children* “not less than 2,000,000 children of school age in the United States are the victims of poverty which denies them common necessities, particularly adequate nourishment...such children are in very many cases incapable of successful mental effort, and much of our national expenditure for education is in consequence an absolute waste.” (Spargo, 1906)

These strong words promoting child nutrition in public schools finally made an impact when in 1908, New York City Schools Superintendent of Schools Dr. William H. Maxwell encouraged his Board of Education to “establish in each school facilities whereby the pupils may obtain simple wholesome food at cost price.” With this call to action by Dr. Maxwell, New York City Public Schools developed two pilot school food service programs to help serve the needs of the children (Roberts, 2002)

In addition to seeing school enrollments increase in urban areas, the progressive era was a time of great immigration within the United States. By the start of World War I, one quarter of the population was comprised of immigrants and their children. From a social standpoint, education was seen as critical to the upward mobility of immigrant children (Lassonde, 1998). Schools provided a way for society to Americanize immigrants (Mershon, 2008). School lunches that were served to these populations were seen as a part of the Americanization process. It was through that if the students were taught to eat American-style food, then the students

would take those food preferences back to their families, thereby Americanizing the adult immigrants as well (Levine, 2008).

As World War I's influence reached the United States, its impact could be seen in social programs, as well as in how people viewed nutrition. One out of every three men who attempted to enlist in the military during World War I was turned away due to diseases that were linked to malnutrition (Roberts, 2002; Levine, 2008). This pushed nutrition into the national spotlight. All of a sudden, children not getting adequate foods was not only a concern for families or communities, it was a national security concern. Along with this new concern for nutrition, WWI brought with it food conservation programs and influenced how Americans ate (Levine, 2008). It was thought that if schools could teach children proper nutrition, then not having enough healthy, draft-able men for future wars could be a thing of the past.

As influential as WWI was, there were other aspects of the progressive era that also played into the development of child nutrition programs. The child-saving movement of the progressive era brought society's attention to the special needs of children in many areas of life. Historian Steven Mintz states, "Progressive era child-savers greatly expanded public responsibility and professional administration of child welfare programs." It was during this era, that the White House held its first Conference on Children in 1909 and established the Children's Bureau in 1912. The Children's Bureau promoted a whole child philosophy (Mintz, 2004), which would become central to those who would push for the inclusion of free lunches for children in need at all public schools.

Progressive education focused specifically on responding to the needs of children. This movement also helped integrate schools and communities (Rury, 2012). As people began

to become more accustomed to progressive education ideas, it shaped the way Americans thought about stages of development (Lassonde, 1998). It is likely that this understanding of development helped people understand the long-term harm that could be done by malnutrition. Children who were not getting the proper nutrients could not be expected to hit developmental milestones in the same way, and since developmental milestones build on top of one another, delaying development in one area could significantly impact a child's future.

However, it wasn't until 1920 that the New York City Schools took control of the elementary school lunch program within the district. (Gunderson, 2014) Other large districts including Cincinnati, Chicago, St. Louis, and Los Angeles, made strides in school child nutrition programs during this same era. These local nutrition efforts were funded by civic and volunteer organizations and through state and local legislation. Despite these local funding sources, it was evident that more substantial federal funding would be needed to ensure the success of the programs.

With the progressive era drawing to a close, the National School Lunch act was still over 20 years away from becoming a reality. The difficulties of implementing some of the idealist child-saving goals of the progressive era seemed to be slipping away as the United States crashed into a depression in the 1930's. Steven Mintz summed up its impact on social welfare policy well by stating that "the depression toppled the notion that children's welfare could be left to individual families, private charities, local and state governments." However, it wasn't just children that needed the help of the federal government.

With the great depression came significantly depressed agricultural prices causing the farmers to demand relief (Levine, 2008). A solution to this agricultural problem was found as

the federal government purchased surplus food, and donated it to schools that agreed to serve it for lunch. This signaled a shift in the government's interaction with school nutrition programs (Roberts, 2002). The first year of this program, around 60,000 schools signed up to receive the agricultural surplus, which greatly increased the number of schools across the country that were serving lunch (Levine, 2008).

The funding established to support school meals came first not in the form of payments made directly to schools, but through Public Law 320, which was passed by the 74th Congress on August 24, 1936. This law created the Commodity Donation Program. This commodity program allowed schools to get surplus food from the government and use it for their school meal programs. Between the years of 1939 to 1942 the commodity program helped increase participation in school nutrition programs by over 5 million students (Food & Nutrition Services, USDA, 2014; Gunderson, 2014). World War II had a negative impact on the availability of commodities available for school nutrition programs, and contributed to a drop in participating programs around 1944. It was around this time that Congress approved cash subsidies for school lunch programs so that the schools could purchase non-commodity food. This is actually where the National School Lunch Program began, although it was funded on a year-to-year basis by the Department of Agriculture. In retrospect, it was the influence of the 2nd World War that solidified America's need for a permanent National School Lunch Program. Advocates for universal school lunches began to push their agenda that a nation without healthy, well-fed children would not be able to defend itself.

This push for the wartime importance of good nutrition was so strong, that in 1943, federally funded school lunch programs were moved to the War Food Administration. Later, John Flannigan, co-sponsor of the National School Lunch Program bill in the

House of Representatives, embraced the importance of school nutrition as a national security concern, stating that "The dictator nations exist upon hungry bodies and befuddled minds. If you want to dispel the gloom of Nazism and communism from the face of the earth, the thing to do is feed and educate the peoples of those nations. A full stomach and a trained mind will never embrace either Nazism or communism" (Levine, 2008)

The 79th Congress passed Public Law 396 on June 4, 1946, which created the National School Lunch Program and established permanent funding for school meal programs. This act declared:

“as a measure of national security, to safeguard the health and well-being of the Nation’s children and to encourage the domestic consumption of nutritious agricultural commodities and other food, by assisting the States, through grants-in aid and other means, in providing an adequate supply of food and other facilities for the establishment, maintenance, operation and expansion of nonprofit school lunch programs.”

Upon signing the bill, President Truman said "no nation is any healthier than its children or more prosperous than its farmers." The bill was introduced by Richard Russell, a conservative democratic senator from Georgia. However, there were many who were adamantly opposed to the legislation. This sentiment was seen the policy's opponents, who "clearly viewed government involvement with childhood meals and food habits to be a major threat to the development of individual character and initiative" (Levine, 2008).

Sadly enough, in reality, the first nationally sponsored schools meals were more of a way for legislators to help farmers than a way to ensure the proper growth and nutrition of school meals. As Susan Levine points out, "for the first 15 years of its existence, the NSLP

served primarily as an outlet for surplus commodities and only secondarily as a nutrition program for children." Despite this less than child-centric founding, the National School Lunch Program has now become the premier source of nutrition for America's children who live in poverty, and has out-last-ed a majority of other federal welfare initiatives.

By participating in the National School Lunch Program, Local Educational Agencies (LEAs) were required to create agreements with their State Educational Agency (KSDE in Kansas). The state agency would over-see that the following requirements were met by each LEA: Meet the minimum nutritional requirements as prescribed by the Secretary of USDA, serve meals without cost or at a reduced cost to children unable to pay for meals (as determined by the LEA), operate in a non-profit manner, utilize commodities, and maintain proper records.

Federal funding for the National School Lunch Act was clearly outlined in the 1946 legislation. The formula for funding was based on the "number of school children between the ages of 5 and 17, inclusive, in the State, and the need for assistance in the State as indicated by the relation of the per capita income of the United States to the per capita income of the State" (79th Congress, June 4, 1946). Using this formula, states with equal numbers of children and similar levels of poverty would receive the same funding. Student participation rates were not initially considered, which meant that states with higher participation received a smaller reimbursement rate per meal. In 1962, amendments were made to the National School Lunch Act to correct the inadequacy of the initial funding formula. This amendment provided that funding would be appropriated based on participation rates and the state assistance need rate (Congress, Oct. 15, 1962).

The Child Nutrition Act of 1966 increased the influence of the federal government in child nutrition programs by stating that "it is hereby declared to be the policy of Congress that

these efforts [school meals/nutrition] shall be extended, expanded, and strengthened...as a measure to safeguard the health and well-being of the Nation's children..." (89th Congress, November 3, 1965) A part of this effort to strengthen child nutrition programs came in the form of a two year pilot breakfast program in 1966-1968 (Gunderson, 2014). During this era, school meal participation was greatly dependent on the opinions of the communities and administrators in each district. As reported in Jean Fairfax's report *Their Daily Bread*, one principal interviewed said that "I don't believe in free lunches for welfare people...It is not a welfare or educational responsibility. It is the parents' responsibility." (Fairfax) This notion, that it is the parent's responsibility to feed their own children, and the parent's fault if they are not financially able to do so, continued to be an issue going forward, and to a certain extent, also impacts school nutrition programs today. This social trend was summed up well by Robert Bremner in his 1976 article "Public Policy and Childhood in the United States":

"Historically, we have been more generous to orphans than to offspring of parents whose behavior violated social norms. Today, as in the past, public policies affecting poor children are determined not so much by the needs of the children as by approbation or (usually) disapprobation of the conduct of parents." (Bremner, 1976)

Despite the political opinions around the nation regarding the feeding of poor children, in 1970, the 91st Congress amended the National School Lunch Act, which then set national guidelines for determining eligibility for free or reduced priced meals (Gunderson, 2014).

The amendment outlined that national guidelines are updated annually and are to be updated on July 1 of each year, and would be based on a family's size and gross income. In partnership with these guidelines, LEAs became required to develop a policy statement regarding

free and reduced price meals, inform families in the LEA about the eligibility standards for the program, provide families with appeal procedures, and protect the eligibility status and names of students who were receiving meal program benefits. With a national system of uniform eligibility guidelines in place, districts across the country were required to submit monthly participation reports to their state agencies. These reports showed how many meals were served to students qualifying for free meals, reduced price meals, and student who pay regular price for their meals. Districts were then reimbursed a specific dollar amount for each student, dependent on his/her eligibility category, with schools receiving the most reimbursement for providing a free meal, and the least reimbursement for providing a regular price meal (Congress 9. , May 14, 1970). These changes made to the National School Lunch Act were important to ensure national program integrity, and are still a part of the National School Lunch Program today.

PROVISION 1, 2, 3

In 1980, Congress updated the National School Lunch Act by adding two alternative provision options for determining eligibility for free and reduced priced meals (Congress 9. , 1980). These provisions were created as a way for Local Educational Agencies (LEAs) to reduce the administrative burden that were associated with the processing of free and reduced meal benefit applications. These alternative provisions were simply called “Provision 1” and “Provision 2.”

To be eligible to adopt Provision 1, districts must have an enrolled student population in which at least 80% of students qualify for free or reduced price meals. Once adopting Provision 1, districts are only required to provide the annual notification and certification of meal benefits once every two years (as opposed to every year). Under this provision, new families enrolling in

the district must be allowed to fill out meal applications regardless of when in the two year cycle they enter the district. Other meal claiming under Provision 1 remains the same; meals are claimed and reimbursed based on the individual student's free, reduced, or full price status.

Provision 2 changed the LEA's requirements for both eligibility determinations and claiming procedures. Under Provision 2, the LEA agrees to serve all meals at no-cost to the students. The district is then reimbursed for the total number of meals served based on the percentage of free/reduced/paid students in the district. For example, if the district's claiming percentage is 90% free, 5% reduced, and 5% paid, and the district serves 100 meals in the month, 90% of the meals would be reimbursed at the federal free rate, 5% at the federal reduced rate, and 5% at the federal paid meal rate. The district is financially responsible for covering the difference between the expense of providing meals at no cost to all students and the federal reimbursement. This operational expense is required to be paid for with non-federal dollars. LEAs use their free and reduced percentages to establish a claiming percentage at each school. The year that this percentage is established is called the "base year." This claiming percentage is then held by the district for a total of four years (based year + 3 years). During this four year cycle, the LEA does not collect meal benefit applications from any families, because individual student eligibility or enrollment changes do not affect the claiming percentages.

In 1995, another benefits issuance and claiming provision was added to the available options for school food service authorities (SFAs). Provision 3 is similar to Provision 2 in that it reduces the administrative paperwork involved in collecting and processing applications. It also simplifies the claiming process by eliminating the need to identify each student's benefit level at the point of service. By adopting Provision 3, LEAs agree to serve meals to students at no cost to the families. The amount of reimbursement received by the LEA is then determined by its

base year's level of federal cash and commodity support (adjusted each year for changes in enrollment and inflation). As with Provision 2, in this option, districts are required to cover the cost difference of operations with non-federal funds.

One of the greatest challenges that Kansas faces in regard to these alternative provisions for the school meal program is the state's need for individual student socioeconomic data in order to calculate each district's weighted full-time enrollment. Provision 1, 2, and 3 were all added to the National School Lunch Act with the expressed purpose of reducing the amount of free/reduced paperwork and data that a sponsor would be required to collect each year. Without accurate free/reduced data, districts stand to lose a great deal of state aid each school year. Kansas' funding formula in effect during the 2014-2015 school year has been in place since 1992. This type of funding formula is fairly common across the United States. In 2005, a study from the Education Commission of the States showed that 25 states plus the District of Columbia utilized funding formulas similar to that used in Kansas (Griffith, May 2005). Despite the necessity for Kansas districts to collect this individual student information, data reaching back to 2002 shows that Provision 2 was taken up by a select number of schools in 3 districts in Kansas, but by the 2010-2011 school year, almost every school in the state had moved back to traditional claiming methods. One of the most common reasons cited by districts as to why they returned to traditional claiming methods was the need for annual collection of individual student socioeconomic data. Districts received negative feedback from their patrons when requiring all families to complete socioeconomic surveys to determine those students who fall within the "at-risk" category. However, if supplying family income information to the school district was purely optional (even if it was clearly explained that the school needed it for funding purposes), a

significantly smaller number of families provided data to the district. Because of this issue, the return to traditional claiming methods made sense for school districts' financial bottom lines.

THE COMMUNITY ELIGIBILITY PROVISION

In 2010, the 111th Congress passed the Healthy Hunger Free Kids Act. (111th Congress, December 13, 2010) This act set into a motion a series of changes and revisions to the National School Lunch Act, and provided “for the first time in over 30 years, [the] opportunity to make real reforms to the school lunch and breakfast programs by improving the critical nutrition and hunger safety net for millions of children.” (FNS, USDA, 2014) Changes that occurred in school nutrition programs after the passing of this legislation included improvements to the direct certification of free meal program benefits for children, the creation of grants aimed at increasing participation in programs, as well as grants that provided financial backing to school wishing to upgrade kitchen equipment and program administrative tools, new meal pattern requirements that mandated more fruits, vegetables, and whole grains, requirements for school wellness policies, mandates changing certain financial aspects of programs, and a provision allowing low income schools to provide meals to all students at no-charge without needing to process free and reduced applications. No-charge meal provision was called the Community Eligibility Provision (CEP). (111th Congress, December 13, 2010)

The CEP provides a different alternative for how high poverty schools and school districts can get reimbursed for the meals they serve within the National School Lunch Program and the School Breakfast Program. This provision aims to reduce paperwork associated with traditional free and reduced meal applications while increasing student access to free and healthy meals during the school day. While operating under the Community Eligibility Provision, all

students in a designated CEP school receive breakfast and lunch at no cost. The district or school is then reimbursed at the federal free reimbursement rate for a percentage of the meals (anywhere from 64-100%), and the rest of the meals are reimbursed at the federal paid rate. The school sponsor then agrees to pay the remainder of the meal costs (the production costs that are not covered in full by the federal paid rate) from non-federal funds. (Department of Agriculture, Food and Nutrition Services, November 4, 2013)

The reimbursement rate for CEP is set by multiplying the percentage of students who are directly qualified to receive free meals (meaning the parents are not required to fill out a free/reduced meal application), by a federally set multiplier. This multiplier can range between 1.4-1.6. The result of this multiplication determines the percentage of meals that will be reimbursed at the federal free rate. Since the initiation of CEP, the federal CEP multiplier has been 1.6. The multiplier range was set by the government based on national research indicating that for every 10 students who are directly certified to receive free meals, there are an additional 4-6 students who qualify for free or reduced price meals based on income. Under the guidelines of the Healthy Hunger-Free Kids Act, USDA has the authority to change this multiplier on an annual basis as they see fit, as long as it is within the 1.4-1.6 range. However, schools and districts that adopt CEP have the option to maintain the established reimbursement rate for up to 4 years. This means that even if USDA did reduce the CEP multiplier to 1.4, LEAs that were already participating in CEP would be grandfathered in at the higher rate.

This is different from traditional meal counting and claiming procedures in which a sponsor is reimbursed at 3 different rates: free, reduced, or paid. In the standard system, the sponsor counts the number of students who eat in each meal category, and is reimbursed at the corresponding rate for each group. The reimbursement rate for each student is determined on an

individual and annual basis, which results in hours upon hours of application processing and verification. (KSDE Child Nutrition & Wellness, 2009)

In most cases, use of the CEP formula for calculating reimbursement rate percentages results in slightly higher overall reimbursement for LEAs, because students who were being claimed under the “reduced price” category get accounted for with the use of the 1.6 multiplier. This means that although the district no longer gets to claim those students in that category, most often, a similar number of students added into the number of students reimbursed at the free rate.

Participation in the Community Eligibility Provision is voluntary for schools or districts that meet the minimum threshold for participation. In order to be eligible for the CEP, a district must have at least 40% of its students qualify for free meals via a specific set of criteria. This percentage is known as the identified student percentage, or ISP. For a student to count as part of the ISP, the student must be directly certified for free meals by means of Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), Food Distribution Program on Indian Reservation (FDPIR), foster, homeless, migrant, runaway status, Head-Start or Even-Start participation. The number of students identified in these categories is then divided by the total number of students enrolled in the school, to calculate the ISP. (Department of Agriculture, Food and Nutrition Services, November 4, 2013)

Once a school reaches an ISP of 40% and elect to use the Community Eligibility Provision, the school must then serve all students breakfast and lunch without charge. Schools that participate in CEP do not collect Child Nutrition Program Benefit Applications (free/reduced meal applications), which can reduce some of the paperwork and administrative burden that comes with operating a school nutrition program. Students are all placed on an even-footing in

the cafeteria, without the worries of wondering if their parents remembered to put money into their meal accounts, and without the possible stigma that is often associated with receiving free or reduced priced meals at school. (Department of Agriculture, Food and Nutrition Services, November 4, 2013)

<i>Claiming System</i>	Eligibility	Application Collection	Reimbursement	Other Factors
<i>Traditional</i>	Option for all NSLP/SBP	Annually	Based on individual student eligibility (paid, reduced, free)	Meal counting must link specific students to meals
<i>Provision I</i>	80% of students must be free/reduced	Every-other year + new students upon entering the district	Based on individual student eligibility (paid, reduced, free)	Meal counting must link specific students to meals
<i>Provision II</i>	Option for all NSLP/SBP	Every 4 years. Provision cycle involves base year + 3 additional years.	Percentage of total meals served claimed in each category based on “base year” applications. Ex: 80% Free, 5% Reduced, 15% Paid	Counting and claiming based on total # of meals served, multiplied by the percentage established for each category during the base year.
<i>Provision III</i>	Option for all NSLP/SBP	Every 5 years. Provision cycle involves base year + 4 additional years.	Percentage of total meals served claimed in each category based on “base year” applications. Ex. 80% Free, 5% Reduced, 15% Paid. Can be adjusted based on enrollment and inflation.	Counting and claiming based on total # of meals served, multiplied by the percentage established for each category during the based year.
<i>CEP</i>	40% Identified Student Percentage required	None.	Percentage of total meals served claimed as Free (ISP * 1.6). Remainder of	Counting and claiming based on total # of meals served, multiplied by the percentage

		meals claimed at Paid rate.	established at the start of CEP cycle.
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USDA Community Eligibility Provision Evaluation

The Community Eligibility Provision (CEP) of the Healthy, Hunger Free Kids Act (HHFKA) of 2010 was phased in over a four-year period, starting in School Year (SY) 2011-2012. This purposeful and gradual implementation included Illinois, Kentucky, and Michigan (referred to as Year 1 States), the District of Columbia, New York, Ohio, and West Virginia (referred to as Year 2 States), and Florida, Georgia, Maryland, and Massachusetts (referred to as Year 3 States). The final year of implementation (year 4) opened up the availability of CEP to all Local Educational Agencies (LEAs) nationwide. As a part of the act's requirements, USDA was mandated to examine the implementation and impacts of the Community Eligibility Provision within the test states. This evaluation was published in February of 2014. This thorough examination of the initial implementation of CEP provides us with a comparative tool that allows us to better understand the implementation of CEP within Kansas with both a local and national lens.

The scope of USDA's Final Report is large and multi-faceted. The study's design included both an implementation study and an impact study. Topics examined in-depth included acceptability of CEP, incentives and barriers, operational issues, impacts on participation and revenue, errors in certification, counting, and claiming, meal quality, and CEP effects on food choice. Although all of these program aspects provide valuable insight into the impact of the

Community Eligibility Provision, we will only be using some of them for the purposes of evaluating the implementation of CEP in Kansas.

USDA's analysis of the impact of CEP was based on data from the 7 states that were a part of year 1 and year 2 implementation. The evaluation was broken into two separate areas of study, which were outlined in the HHFKA legislation. These two areas research involved an implementation study and an impact study.

The first area of study addressed with this report was deemed the "Implementation Study." This section of the report fulfilled the Congressional mandate of estimating the number of LEAs who choose not to utilize the Community Eligibility Provision, examining the barriers to participation of CEP, and describing the LEAs that took up CEP. To evaluate take up of CEP, the study examined descriptive data from CEP participating LEAs, CEP eligible (but not participating) LEAs, and LEAs that were near-eligible. In order to assess the barriers to participating in CEP, researchers collected data on experiences and attitudes of participating LEAs as well as data and input from State Education Agencies regarding barriers to CEP adoption.

The implementation study found that about 30 percent of eligible LEAs opted to participate in CEP. However, these participation rates varied widely between states. Of these LEAs that chose to participate in CEP, 92 percent of those that were eligible to offer CEP LEA-wide did so. LEAs that elected to participate in CEP on average had larger student enrollments, higher ISPs and Free/Reduced Price Meal Percentages, higher numbers of students enrolled in grades K-5, and higher percentages of students who are Black. They were also more often urban and charter schools. The four factors most significantly associated with CEP adoption by an

LEA (after using an analytic model to control for other factors) were: ISP, enrollment, State, and charter status (although this finding was only found at a significant level in Ohio).

There were a variety of barriers and challenges that were found to be associated with the take up of CEP. The first barrier included a limited timeframe for key administrators to make decisions about participation and implementation. This barrier was thought to dissipate with time as more districts get comfortable with the regulations surrounding CEP and its implementation requirements. There were also concerns regarding the implications of CEP on educational programs that use individual student free and reduced qualification data for a variety of purposes. This was a wide-spread concern indicated by many State Agency Directors. Other challenges involved equity issues and operational challenges, especially in SFAs in which not all sites were eligible to participate in CEP.

The first step of USDA's impact study was to use propensity matching scores to pair CEP participating "treatment" LEAs with a non-participating "comparison" LEAs with similar characteristics. By paring LEAs in this manner the researchers hoped to negate as many confounding variables as possible. Data comparisons, LEA characteristics, along with interviews from State Child Nutrition Agency Directors and staff, and Title I Directors were used to match LEAs. Characteristics that were used in the propensity score model included ISP rates, differences between ISP and Free/Reduced percentage, percentage of students who are English Language Learners, percentage of students in various grade groups (K-5, 6-8), LEA urban/rural status, percentage of students who are Black, percentage of students who are Hispanic, percentage of Title I schools, and Charter School status. The researchers purposefully excluded a variety of LEAs from the research, such as LEAs that serve special populations, private schools, LEAs already offering universal free meals programs (including, but not limited to

Provision 2 and Provision 3 schools), and CEP participants that only utilized the provision for one year.

The impact study aimed to determine how CEP affected a variety of factors within the school food service operation. The first area of impact addressed involved changes in program participation and revenue. Under CEP, student participation in the National School Lunch Program (NSLP) increased by 5 percent and student participation in the School Breakfast Program (SBP) increased by 9 percent, relative to matched comparison schools. LEAs that participated in CEP also showed a significant increase in Federal meal reimbursement (about 6 percent increase for the NSLP and 2 percent increase for the SBP). CEP did not positively or negatively impact other revenue sources within the school meal programs. With this finding the study suggested that CEP likely produced a net gain for the participating LEAs by increase participation and Federal reimbursement, while not losing revenue from other sources (such as paid meal income).

Breakfast meal service was also analyzed during the course of the impact study. It was found that although CEP did not increase the availability of breakfast, CEP participation did lead to LEAs being more likely to adopt less traditional breakfast service styles, such as breakfast in the classroom. Traditional meal counting and claiming methods are often complicated to implement with non-traditional service, such as breakfast in the classroom; however, CEP allows for simpler meal counting and claiming, which pairs nicely with such alternative serving methods.

Other impacts mentioned in this study included CEP contributing to a decrease in staff time processing and verifying free and reduced price meal applications and collecting and

accounting of meal payments (a savings that was estimated to be approximately \$29 per student). However, the study did show an increase in staff time at CEP schools in the areas of meal counting and claiming. Overall meal benefit certification errors went down at CEP schools, due to not needing to collect meal benefit applications. At comparison non-CEP schools the study showed that 6.6 percent of applicants were given the wrong certification level (too low or too high). CEP's impact on meal quality was also examined during the course of this study. There was no evidence that CEP had a significant impact on meal quality. However, at lunch, CEP schools did have a tendency to offer more vegetables, but were less likely to have reduced sodium levels. The impact study also showed that CEP did not impact the number of food choices offered at breakfast or lunch.

IMPLEMENTATION IN KANSAS

Per the regulations outlined in the Healthy Hunger Free Kids Act of 2010, Kansas notified their sponsors about the Community Eligibility Provision on Feb 26, 2014. (US Federal Government, 1 Oct. 2010) This information was initially shared with sponsors through a monthly update that is sent from Child Nutrition & Wellness at the Kansas State Department of Education. In this notification, sponsors were briefly informed about the provision and it was going to be available nation-wide beginning July 1, 2014. The update did not include specific details, but told sponsors to look for more information and a webinar in March 2014. (Cheryl Johnson, KSDE Child Nutrition & Wellness February 2014 Update, 2014)

As promised in the February update, on March 26, 2014, more detailed information was released to the sponsors via the CN&W Monthly Update. This update included more specifics about how to calculate the Identified Student Percentage, the claiming and reimbursement

procedure, and the next required steps. The update also contained information regarding a webinar that was to be held on April 30, 2014. (Cheryl Johnson, KSDE Child Nutrition & Wellness March 2014 Update, 2014)

The next required steps, as outlined in the federal guidelines, required all sponsors in the state except for Residential Child Care Institutions (who are not eligible for CEP) to inform the state of their enrollment and number of students eligible for free meals based on directly certified means (also called identified students) at each site as of April 1, 2014. This identified student percentage (ISP) includes the students who receive the following state benefits:

- Supplemental Nutrition Assistance Program (SNAP);
- Temporary Assistance to Needy Families (TANF);
- Food Distribution Program on Indian Reservations (FDPIR);

The identified student percentage also includes other categories of students, such as:

- Homeless children as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C.11434a(2));
- Runaway and homeless youth served by programs established under the Runaway and Homeless Youth Act (42 U.S.C. 5701);
- Migrant children as defined under section 1309 of the Elementary and Secondary Education Act of 1965 (20U.S.C. 6399);
- Foster children certified through means other than a household application;
- Children enrolled in a Federally funded Head Start Program or a comparable State

funded Head Start Program or pre-kindergarten program;

- Children enrolled in an Even Start Program; and
- Non-applicant students approved by local education officials, such as a principal, based on available information (Food and Nutrition Services, 2013)

These numbers were due to CN&W by April 15, 2014 in order that KSDE could produce federally required reports designating schools and sponsors that were eligible or near-eligible for CEP. To be eligible for CEP, sponsors must have an identified student percentage (ISP) for at least 40% at each school, within a group of schools, or at a sponsor level. Near-eligible sponsors have an ISP of at least 30% but not 40%. (Food and Nutrition Services, 2013)

Initial federal requirements gave sponsors until June 30th 2014 to elect participation in the program. USDA recognized that since this is the first year of CEP, many sponsors were unsure if they would want to participate, and needed more time to evaluate the option for local feasibility. Therefore, USDA released a memo on June 12, 2014 titled “Extension of the Deadline for Local Educational Agencies to Submit Applications to Elect the Community Eligibility Provision.” This memo extended the deadline for sponsors to elect CEP to August 31, 2014 for School Year 2014-2015 only. (Food & Nutrition Services, USDA, 2014) In Kansas, this extension was welcomed by all sponsors that were considering CEP. Many of the food service directors in the area were very eager to sign up for CEP, but needed more time to rally support from administrators, schools boards, and communities.

During the summer months of 2014, KSDE Child Nutrition & Wellness (CNW) staff contacted sponsors that were eligible to participate in CEP. CNW consultants answered sponsor questions and helped them evaluate if CEP was a good fit for their organizations. Consultants

helped programs crunch numbers, talked to administrators, and provided resources over the phone and via email.

CNW offered its programs tools and resources online to help sponsors decide if CEP was right for them. Guidance documents posted on the CNW website from USDA included Policy Memo SP 21-2014 “Community Eligibility Provision: Guidance and Q & As” (Food & Nutrition Services, USDA, 2014) Title I Guidance (U.S. Department of Education, Office of Elementary and Secondary Education, January 2014), and a presentation from the Annual Nutrition Conference of the School Nutrition Association (Maggie Applebaum, 2014). Other guidance documents on the website included “Community Eligibility Provision in Kansas- Frequently Asked Questions” from KSDE, a link to a CEP Webinar hosted by CNW on April 30, 2014, an application for State At-Risk Funds, a CEP Decision Tree, and E-rate guidance from the FCC, additional information from the Food Research and Action Center (FRAC) and the Center on Budget and Policy Priorities included a five page informational document published on June 19, 2014, and a CEP Infographic. Two Excel workbooks were also posted to the website. One from USDA titled “Monthly Federal Reimbursement Estimator” and one that sponsors could use to compare the change in reimbursement as compared to the standard claiming procedure (titled “CEP Reimbursement Worksheet”).

Each summer, School Nutrition Programs are required to go through a program renewal process. This process involves each sponsor filling out a sponsor level application and a site level application for each site. These applications outline the general administrative practices that will take place within the school nutrition program, such as what meals are served, meal service times, record of health inspections, affirmation of civil rights training, how meals are served, how meal accounts are managed, and the oversight of Child Nutrition Program Benefits

(free/reduced meal applications). For the 2014-2015 school year program renewal process, sponsors were also required to indicate on the sponsor application if they wished to participate in the Community Eligibility Provision. All sponsors were also required to sign the “2015 Program Agreement for School Nutrition Programs.” Under this agreement, all sponsors agreed that:

W. Community Eligibility Provision

If the Sponsor elects the Community Eligibility Provision, the Sponsor agrees to:

1. Indicate on the Sponsor Application if the Sponsor, a school or a group of schools will participate in the Community Eligibility Provision and complete the Community Eligibility Application in KN-CLAIM prior to June 30. To be eligible, the Sponsor and/or schools must meet a minimum level (40%) of identified students for free meals in the year prior to implementing the Community Eligibility Provision.
2. Serve free breakfast and lunch meals to all students, enrolled in a school participating in Community Eligibility Provision regardless of their eligibility for CNP benefits.
3. Not collect free and reduced price applications from households in participating schools
4. Cover the difference between the cost of providing the meals and the total reimbursement received for each student meal using non-Federal funds.
5. Reimbursement is based on claiming percentages derived from the identified student percentages. Schools apply the claiming percentages to the total number of lunch and the total number of breakfast meals served to determine the number of meals claimed at the free and paid rates.

6. The claiming percentages established for a school in the first year may be used for a period of four school years and may be increased each year if the identified student percentages rise for the Sponsor and/or school.

7. The percentage of identified students is multiplied by a factor of 1.6 to determine the total percentage of meals reimbursed at the Federal free reimbursement rate (The percentage derived from this calculation must not exceed 100 percent). The remaining percentage of meals, equaling up to 100 percent, is reimbursed at the Federal paid reimbursement rate. (2015 Program Agreement).

On July 15, 2014, program renewal paperwork was due to Child Nutrition and Wellness. At this point, CNW ran a query within its online system to identify all sponsors that had indicated on the sponsor application the desire to participate in CEP. On that date, 21 sponsors were identified as potential CEP sites, based on self-election within the program renewal process. As CNW looked at the list, it was clear that some of these sponsors were not a good fit for the CEP, or were not even eligible. After talking with the technology department who ran the query, it was discovered that there was a compatibility issue with sponsor who were using a specific type of web browser, which would not accept a sponsor's switch from "yes" to "no."

(92) Approval Date:

Will any of your sites be participating in the Community Eligibility Provision(CEP) for the National School Lunch Program*? **Note: Community Eligibility Provision Application must be submitted in KN-Claim by June 30.* ☒

Yes ☐ No

At this point, CNW staff contacted every sponsor who had selected "yes" for question 93 on the sponsor application to see if the sponsor was truly interested in CEP for the 2014-2015 school year. Of the 21 sponsors contacted, approximately five did not understand what CEP was so thought "yes" would be a better answer. Around 10 sponsors were dealing with the browser

compatibility issues and wanted the answer to question 93 to be “no.” 2 sponsors were on the fence about participating, and decided that they were not ready to participate in this upcoming year, but might consider it for the next year. 4 sponsors were eligible and wanting to participate in the program. One additional school, which had not participated in the National School Lunch Program before, decided to become a CEP sponsor as well. These five sponsors varied in size and type from a private school with less than 50 students to a large public district with many schools participating in CEP.

District Name	Public/Private/Semi Private?	Total # of Schools	Total Enrollment	# of CEP Schools	Enrollment at CEP Schools
Sponsor E	Semi Private	1	25	1	25
Sponsor D	Private	1	47	1	47
Sponsor C	Public	13	5,279	1	43
Sponsor B	Public	12	4,818	2	709
Sponsor A	Public	30	13,519	13	5,172

Once CNW had a list of sponsors wishing to participate in CEP, CNW needed to create a procedure to validate the numbers of Directly Certified students in each school that were used to find the school’s Identified Student Percentage. Various procedures were in place from the Early-Adopting states. Some states utilize state-wide student identification software which links to its school enrollment systems. In these states, the data is run through the state system first, and then disseminated down to the schools. In these states, no additional validation is required, because the state systems are thorough and complete. In other states, the Local Educational Agencies are taken at its word regarding its numbers of identified students, and no other

validation is done. Review of the documentation for CEP will be done at these LEAs during its federally required Administrative Review, which occurs every 3 years. Although this is an acceptable process, it could be financially devastating for sponsors if they discover 2 or 3 years into a CEP cycle that its ISP was calculated incorrectly, and they were required to amend multiple years of claims. CNW determined that validating each sponsor's ISP needed to be completed before they began claiming under the Community Eligibility Provision. Due to concerns with student data privacy, CNW determined that the easiest way to validate each sponsor's ISP was to go on-site a look at the documentation that each sponsor has in its own files. A Child Nutrition Consultant drove to each district and made sure they had appropriate documentation on file to prove that each student who was directly certified met the appropriate criteria for being an "identified student." The consultant also looked at enrollment records on April 1, 2014 to ensure that the enrollment numbers reported were accurate as of that date. A variety of findings were discovered during validation:

Sponsor	Issue Found	Change in # of Identified Student
CEP USD 4	No baseline data reported: New Sponsor. ISP will be set by validation.	N/A
CEP XSD 1	4 DC students not located on DC list—no documentation 4 FDPIR students not counted in original total	0 Ident. Students 0 Total Enrollment
CEP USD 3	1 student not on DC list (approved free based on child in care status)	-1 Ident. Students 0 Total Enrollment
CEP USD 1	Numbers reported not exactly the same as numbers on April 1 documentation	+4 Ident. Students -1 Total Enrollment
CEP USD 2	Homeless & Migrant Students not counted, slight variations in enrollment records and enrollment reported	+62 Ident. Students +7 Total Enrolled

Once the ISP for each sponsor was validated, a Child Nutrition Consultant changed the numbers in the state claiming system. This claiming system takes the information and applies it to each sponsor's monthly claims for reimbursement. The goal of conducting validation on-site is to ensure that all ISPs are correct so that the sponsors don't end up with costly errors months or years down the line.

As school year 2014-2015 kicked off, so too, did the first year of the Community Eligibility Provision in Kansas. Kansas' take up percentages were lower than the national average. Kansas had 64 school districts in which at least some of the schools were eligible to participate in CEP. Of those 64 school districts, only 5 utilized CEP to some extent. This is an 8% take up in CEP. The nation-wide take up percentage for CEP was 32% for the 2014-2015 school year. On an individual school level, Kansas had 258 schools that were eligible to elect CEP. Of those eligible, only 18 decided to implement in the first year (7%). Nation-wide, 45% of schools that were eligible to take up CEP in school year 2014-2015 did so (Zoë Neuberger, 2014).

METHODOLOGY (Impact Study)

This research examines the first year that the Community Eligibility Provision was available to Kansas schools. Participation in CEP was optional to all schools that met the minimum requirements of having an identified student percentage (ISP) of at least 40% and served breakfast and lunch. During the implementation year of CEP, five Local Educational Agencies (LEAs) elected to participate in CEP. Of these five LEAs, two were single-site LEAs, and therefore, by default, participated in CEP LEA-wide. Three LEAs elected to participate in

CEP in some schools, but not all. These three LEAs had a combined 16 schools that participated in CEP.

Data was collected from these districts through the KN-CLAIM (Kansas Nutrition Claims and Information Management) system at the Kansas State Department of Education. This is the system through which districts file the federally required claim forms for reimbursement for the meal programs. The meal claims are then processed by KSDE and paid. In the KN-CLAIM system, information such as number of meals served, aggregate information regarding the number of students who qualify for free and reduced priced meals, participation percentages, and financial data from each child nutrition program is available. Interviews were also conducted with Food Service Directors regarding their thoughts and options about CEP. A survey was also conducted near the conclusion of the 2014-2015 school year

In a similar fashion to the USDA Evaluation Study, LEAs that participated in CEP were matched with similar LEAs that chose not to participate in CEP. Participation trends between the test and comparison schools were monitored to see if such participation trends mirrored the results of the USDA impact study.

CHARACTERISTICS OF PARTICIPATING LEAS

There were five LEAs that opted to participate in CEP. For the purposes of this research, focus will be placed on the two largest LEAs that adopted the provision. The other three LEAs that participated in CEP elected to do so due to unique school situations that do not extrapolate out well to other LEAs. All of these LEAs utilized CEP at only one building (or the entire LEA was comprised of one building). Below is a summary of these three LEAs and why they are not examined more deeply in this research.

The first of these districts to adopt CEP was a mid-size public school district with a full-time enrollment of 5,000-8,000. The district located just outside of a major city, and is a relatively affluent district, with a free and reduced percentage of 27.4 percent. On the surface, it appears that this district in no way should qualify to participate in CEP, and in fact, all but one school in the district are ineligible to participate in CEP. However, the district is home to one school for students who are no longer allowed to be in traditional public schools for a variety of reasons. This school has a population of under 50 students, but almost every student in the school is directly certified to receive free meals. Therefore, this school's ISP is near 100 percent, which means that the district can feed all of the students breakfast and lunch at no charge under CEP, and the district can benefit from the simplified claiming procedures available under the provision. However, due to the nature of the school, all of the students were already being fed breakfast and lunch at no charge, and the district was nearly already receiving full free reimbursement for all of the meals. Therefore, the data shows no change in participation or in the financial well-being of the program.

The second of the programs to elect the Community Eligibility Provision was a small private school serving grades K-12 on an Indian reservation. This school has a total enrollment of under 50 students, and 95 percent of its students qualify for free or reduced priced meals. Approximately 63 percent of this school's students are directly certified to receive free meals. Under CEP, this means the school is eligible to claim 100 percentage of its meals served at the federal free reimbursement rate. Before electing CEP, the school was already committed to being a universal non-charge program. In universal non-charge programs, students are not charged for their meals, but the school must still claim the students based on individual eligibility category. So, although the meal process is simpler for the parents and students, the paperwork is

still as burdensome as traditional meal service. Therefore, the transition to CEP did not change student participation, and only marginally increased the reimbursement that the school received for the program. However, this school has historically had a difficult time collecting and determining income based applications, partially due to the transient nature of many of its students. By utilizing CEP, the school was no longer required to collect or process free and reduced applications, and meal claiming became much simpler on a daily basis.

The third of the non-traditional schools to elect to use CEP during the 2014-2015 school year was a specialized academy run by an educational cooperative. This school served the needs of students from the surrounding school districts when the local school districts could not accommodate their needs. The school has previously not participated in the National School Lunch Program or the School Breakfast Program, so they were new to both the federal program and new to CEP. The enrollment of this school was under 25 students, and its students would often transition in and out of the school on very short notice. These children are also more likely to move between various households and often do not have strong support systems at home. Due to this, it would be difficult for the school to get meal applications from families and in cases where the students might not qualify for full free benefits, collecting money from the families was often challenging. Approximately 50 percent of the enrolled students were directly certified to receive free meals. This meant that under CEP, the school would be reimbursed at the federal free rate (approximately \$3.32 per meal) for 80 percent of the meals that they served. They would be reimbursed at the federal paid rate (approximately \$0.62 per meal) for the additional 20 percent of the meals that they served. The school was then responsible for providing non-federal funds to cover the difference between the costs (\$2.70 per meal). This school decided that the amount of time that would be saved in not having to process applications or keeping track of

meal accounts was worth the expense. Because the 2014-2015 school year was the school's first year participating in NSLP and SBP, there is no historical data to determine how CEP impacted program participation or finances.

LEAS OF STUDY FOCUS

The first LEA on which the study will focus on is a mid-sized public school district in central Kansas of 5,000-8,000 students. The district has a free and reduced percentage of 67.8 and a district-wide Identified Student Percentage 34.2. This means that the district was not eligible to participate in CEP district-wide. However, the district is home to two higher-poverty schools, in which the building ISPs are 68.6 and 61.2. Under CEP, sponsors can participate sponsor-wide, as an individual site, or can group sites together to establish a more beneficial ISP. In this district, the sponsor opted to group these two elementary schools together to form a group ISP of 63.9. With an ISP of above 62.5, these two schools were able to provide breakfast and lunch to its students at no-charge, and would be reimbursed for 100 percent of the meals served at the federal free rate. Since 100 percent of the meals are reimbursed at this rate, the district was under no obligation to contribute non-federal funds in order to participate in CEP.

The second LEA on which we will focus on is a larger public school district in the eastern half of Kansas. The district has a full time enrollment of 10,000-15,000 students at 32 sites. 74.8 percent of the students in this district qualify for free or reduced priced meals. This district has an identified student percentage of 47.9. This means that the district could elected CEP as an entire district, but only 76.64 percent of the meals would be reimbursed at the federal free rate and the remainder would be reimbursed at the federal paid rate. The district decided it could not afford to supplement the remaining costs of the program if they elected CEP district-

wide. However, a large portion of the schools in the district were near or above the 62.5 ISP threshold. Initially, the food service director decided to utilize CEP in twelve of the schools. However, one school administrator whose school was not included in the initial twelve was very interested in having CEP at his school, and negotiated that they would serve breakfast in the classroom (at the request of the food service director) in exchange for being included in the group of CEP schools. With this agreement, the number of schools in this district that were designated as Community Eligibility Provision schools increased to thirteen for the 2014-2015 school year. These thirteen schools were grouped into 2 separate groups with ISPs of 61.15 and 61.27. With ISPs of this level, it meant that the district would get reimbursed at the full free amount for 97.8 and 98 percent of the meals served, respectively. The food service director determine that the small percentage of meals that were not reimbursed at the full federal free rate could be covered by non-federal funds within the food service funds (such as state matching funds, which are \$.04 per meal, and a la carte and catering revenue).

Within these two school districts, researchers paired each district and school with similar districts and schools so as to compare how participation changed throughout the course of the 2014-2015 school year. Analysis of CEP impact was done both within the LEAs between the 2013-2014 and 2014-2015 school years, and between the treatment LEAs (those electing CEP) and the non-treatment LEAs (those not electing CEP).

The non-treatment LEA selected as a match for the first CEP district in the study was located in eastern Kansas with a fulltime enrollment of 3,000-5,000. The district wide free and reduced percentage is 62.9, with a district-wide identified student percentage of 40.43. The non-treatment LEA selected as match for the second CEP district in the study was located approximately 1 hour away from the treatment district. This non-treatment district has a student

population of above 20,000, a free and reduced percentage of 89.1, and a district-wide ISP of 50.2. The chart below summarizes the treatment/non-treatment districts.

District	District F/R %	District-wide Enrollment	District-wide ISP
CEP USD 1	67.84%	5,150	34.23%
Non-CEP USD 1	62.87	3,919	40.43%
CEP USD 2	74.69%	14,051	48.42%
Non-CEP USD 2	89.09%	21,931	50.15%

Building	Building F/R %	Building Enrollment	Building ISP
CEP USD 1a	91.45%	451	61.20%
Non-CEP USD 1a	87.50%	421	67.22%
CEP USD 1b	92.08%	258	68.6%
Non-CEP USD 1b	88.16%	255	68.24%
CEP USD 2a	89.80	480	59.58
Non-CEP USD 2a	92.09	378	51.85%
CEP USD 2b	88.76	357	64.71
Non-CEP USD 2b	96.38	282	48.58%
CEP USD 2c	90.30	505	60.40
Non-CEP USD 2c	93.87	176	57.39
CEP USD 2d	80.00	330	59.39
Non-CEP USD 2d	86.14	459	55.99
CEP USD 2e	82.99	591	55.84
Non-CEP USD 2e	98.12	635	58.90
CEP USD 2f	83.61	243	64.61

Non-CEP USD 2f	96.74	409	71.88
CEP USD 2g	80.31	416	61.78
Non-CEP USD 2g	85.55	325	42.15
CEP USD 2h	80.98	639	63.22
Non-CEP USD 2h	92.54	256	52.73
CEP USD 2i	82.71	544	60.29
Non-CEP USD 2i	96.08	191	46.07
CEP USD 2j	81.28	180	58.89
Non-CEP USD 2j	90.26	473	58.12
CEP USD 2k	77.78	248	60.08
Non-CEP USD 2k	86.02	236	50.42
CEP USD 2l	85.06	589	63.50
Non-CEP USD 2al	88.78	529	59.92

Individual sites were also matched with schools of similar socioeconomic status. For group two, the non-treatment LEA had many Breakfast in the Classroom (BIC) schools. The universal BIC program at the non-treatment district has led to a significantly higher breakfast participation rate than comparable districts that serve in a more traditional setting. Since the treatment group two was not previously utilizing BIC, care was taken to make sure that treatment CEP schools were paired with non-treatment schools with similar breakfast service styles. Due to this, some of the paired schools are not as close in free and reduced percentage or identified student percentage as possible.

METHODOLOGY

All LEAs in Kansas are required to submit claims for reimbursement within 60 days of the end of each month of service. Claims are submitted into the KN-CLAIM system and include the number of meals served for each meal type (breakfast, lunch) and each meal category (free, reduced, paid). The number of adult meals served is also reported, along with the number of days of service during that month. The sponsor also reports the number of eligible students who

were enrolled for that month. By dividing the daily average number of meals served by the number of eligible students enrolled for the month, the average daily participation percentage can be calculated.

$$\frac{\text{Average \# of Meals Served Daily}}{\text{\# of Eligible Students}} = \% \text{ Average Daily Participation (ADP)}$$

Since all districts are required to provide this data in the claims for reimbursement, it is simple to compare the differences between the treatment and non-treatment groups. ADP is often used in school food service to indicate the popularity of meal choices and the general acceptance of the meal program as a whole. This data was examined both between treatment and non-treatment districts in terms of the change in ADP between school years, but is also valuable to show change between school years within the district.

After claims have been submitted, sponsors are reimbursed at a set rate for each meal served in each eligibility category. Schools that serve low socioeconomic communities receive additional funding from the federal government (\$.02 per lunch, \$.31 per breakfast in the free/reduced category only). Reimbursement rates are published by the federal government each year in July, and generally they increase by a few cents each year. However, in comparing financial data across school years, it is important to calculate reimbursement evenly without including the annual increase in reimbursement. Otherwise, the financial data would automatically be skewed in a positive manner towards the most current school year.

To analyze the impact of CEP on the district financials, the number of meals served in each eligibility category at each site were pulled from KN-CLAIM at each CEP site. For school year 2013-2014 (before CEP), this means three categories (free/reduced/paid). However, under

CEP, schools only get reimbursed at either the free rate, or the paid rate. So, for the 2014-2015 school year, only those two categories were used. For both program years, the number of free meals was multiplied by the rate of \$3.3475 (\$1.62 for breakfast), the number of reduced meals was multiplied by \$2.9475 (1.32 for breakfast), and the number of paid meals was multiplied by \$0.6475 (\$0.28 for breakfast). These were then added together to get the total reimbursement for each site. The sites were then added together to get a total monthly reimbursement for the sites being evaluated. However, due to changes in the school calendars between years, the number of days of school each month can vary. So, the monthly total reimbursement was divided by the number of days meals were served that month in order to calculate out an average reimbursement amount per day. Financial analysis was conducted within each CEP district only.

Informal interviews were conducted via phone and email throughout the course of the school year with districts that were implementing CEP, as well as with districts that were considering electing CEP for the 2015-2016 school year. A brief online survey of child nutrition professionals and administrators was done near the end of the school year for districts that participated in CEP during the 2014-2015 school year regarding their thoughts, opinions, and practices surrounding CEP.

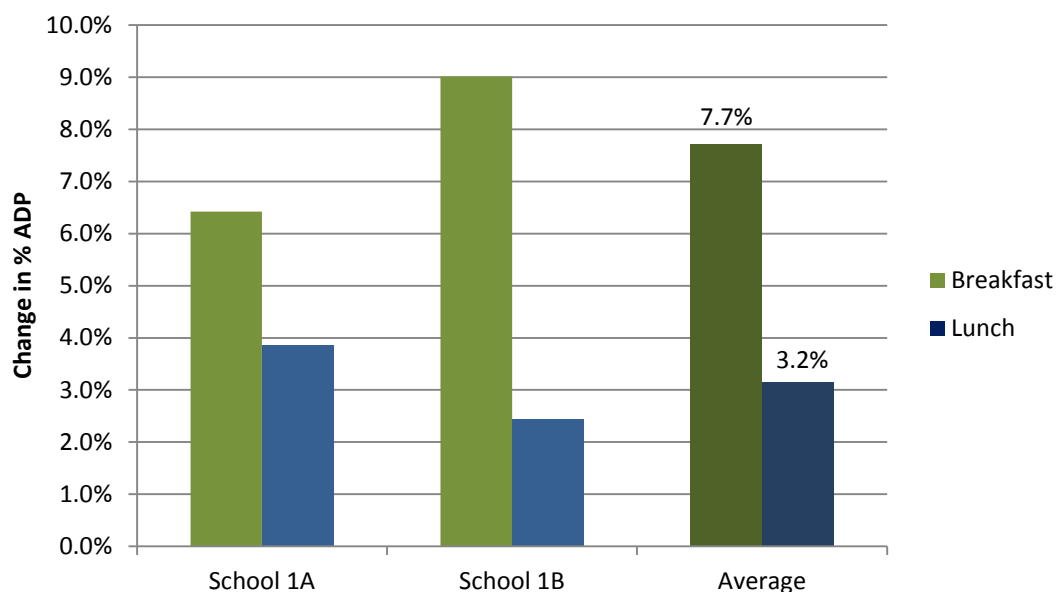
RESULTS

The results from the first year of the Community Eligibility Provision implementation in Kansas were similar to the USDA study in terms of participation trends and change in average reimbursement per meal. At USD 1, percentage average daily participation in the National School Lunch Program increased by 3.2 percent at CEP schools compared to the same schools in the previous school year (before adopting CEP). Relative to the matched non-CEP schools

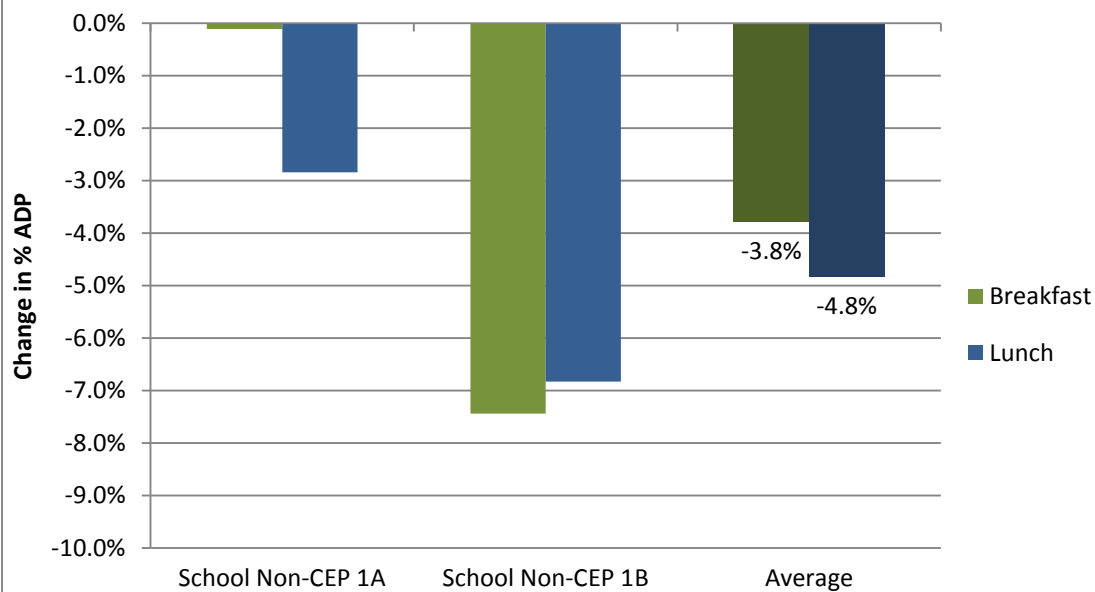
during the same school year, the in change in participation was 8 percent. At USD 2, percentage average daily participation in the National School Lunch Program increased by 3.4 percent at CEP schools compared to the same schools in the previous school year (before adopting CEP). Relative to the matched non-CEP schools during the same school year, the change in participation was 6.3 percent. These results show a slightly higher increase in relative participation than the national average of 5 percent.

In the School Breakfast Program, USD 1 saw an increase in average daily participation percentage of 7.7 percent at the CEP schools as compared to the previous school years. Relative to the matched non-CEP schools during the same school year, the change in participation was 11.5 percent. At USD 2, CEP schools had an increase in percentage of average daily participation of 6.4 percent over the previous school year at the same schools. Relative to the matched non-CEP schools during the same school year, the difference in participation was 8.4 percent. These results straddle the national average relative increase of 9 percent.

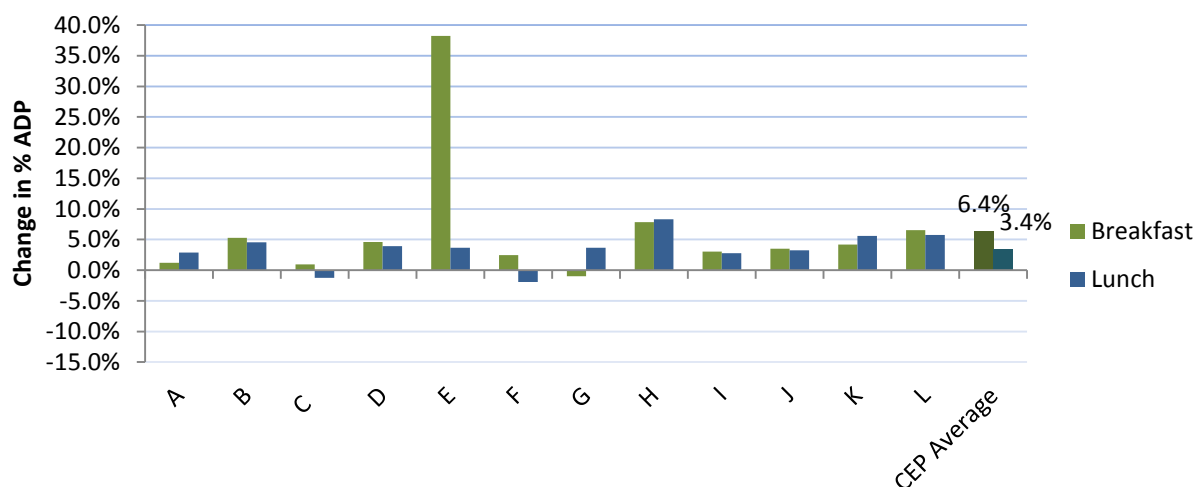
Change in Participation SY2014-SY2015 CEP USD 1



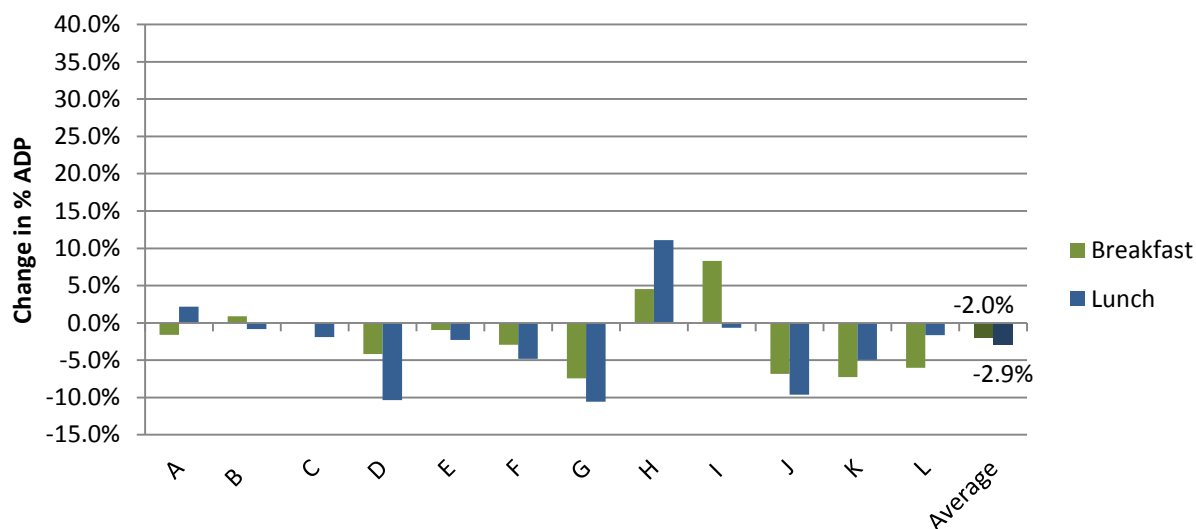
Change in Participation SY2014-SY2015 Non-CEP USD 1



Change in Participation By School SY2014-SY2015 CEP USD 2



Change in Participation By School SY2014-SY2015 Non-CEP USD 2



Financially, USD 1 increased its average reimbursement per lunch from \$3.17 in school year 2013-2014 to \$3.35 in school year 2014-2015. This is a difference of \$0.18 per lunch.

USD 2 increased its average reimbursement per lunch from \$3.15 in school year 2013-2014 to \$3.29 in school year 2014-2015. This is a difference of \$0.14 per lunch. Both of these increases are greater than the national average increase found in the USDA study of \$.06 per lunch.

At breakfast, USD 1 increased its average reimbursement from \$1.58 in school year 2013-2014 to \$1.62 in school year 2014-2015, for a difference of \$.04 per breakfast. At USD 2, average reimbursement per breakfast increased from \$1.56 in school year 2013-2014 to \$1.59 in school year 2014-2015. This is an increase of \$.03 per breakfast served. Both of these increases are just slightly higher than the increase found in USDA's national study of \$.02.

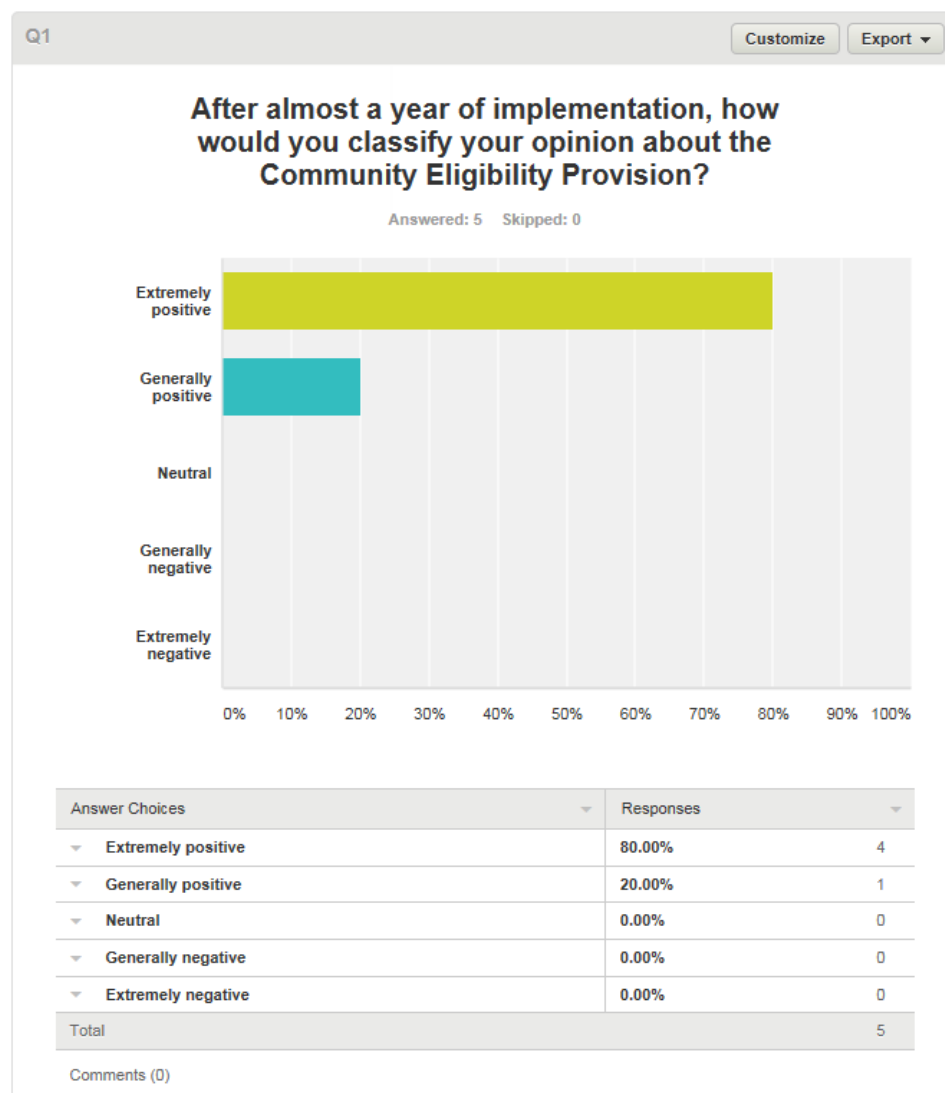
Change in Average Reimbursement per Meal at CEP schools (SY2014-SY2015) CEP USD 1			
Average Daily			
CEP 1	Meals Served	Meal Reimbursement	Reimbursement per meal
Lunch 2015	666	\$2,228.34	\$3.35
Lunch 2014	613	\$1,940.75	\$3.17
Difference			\$0.18
Breakfast 2015	395	\$640.04	\$1.62
Breakfast 2014	319	\$504.25	\$1.58
Difference			\$0.04

Change in Average Reimbursement per Meal at CEP schools (SY2014-SY2015) CEP USD 2			
Average Daily			
CEP 2	Meals Served	Meal Reimbursement	Reimbursement per meal
Lunch 2015	4,448	\$14,635.61	\$3.29
Lunch 2014	4,340	\$13,658.64	\$3.15
Difference			\$0.14
Breakfast 2015	2,661	\$4,235.35	\$1.59
Breakfast 2014	2,298	\$3,595.89	\$1.56
Difference			\$0.03

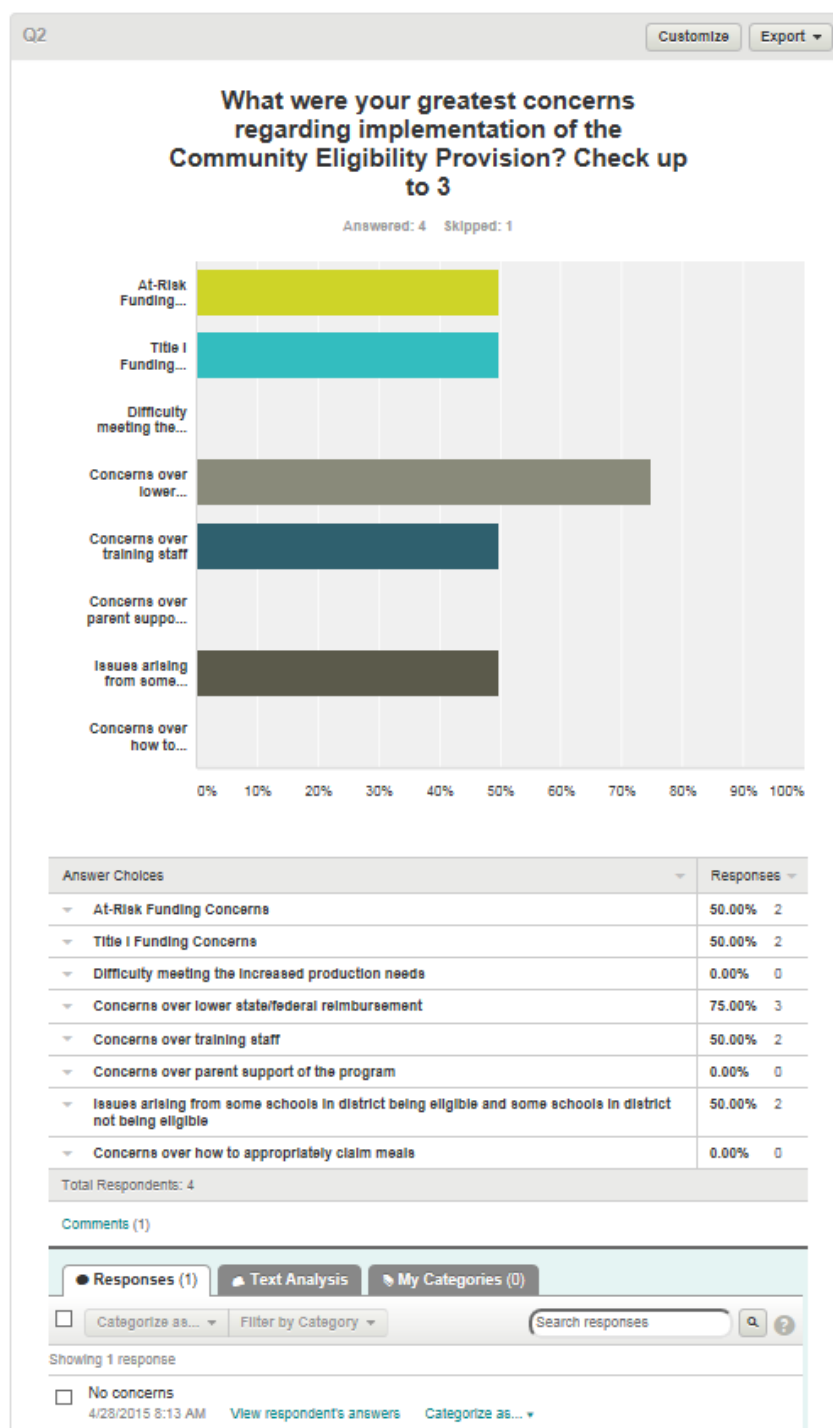
CEP PARTICIPANT SURVEY RESULTS

On April 27, 2015, a CEP Survey was sent out to contacts at the five districts in Kansas that implemented the Community Eligibility Provision in the 2014-2015 school year. Overall, schools personnel responded positively in terms of their opinions regarding CEP. All five districts reported personnel opinions of CEP to be either “extremely positive” or “generally positive.”

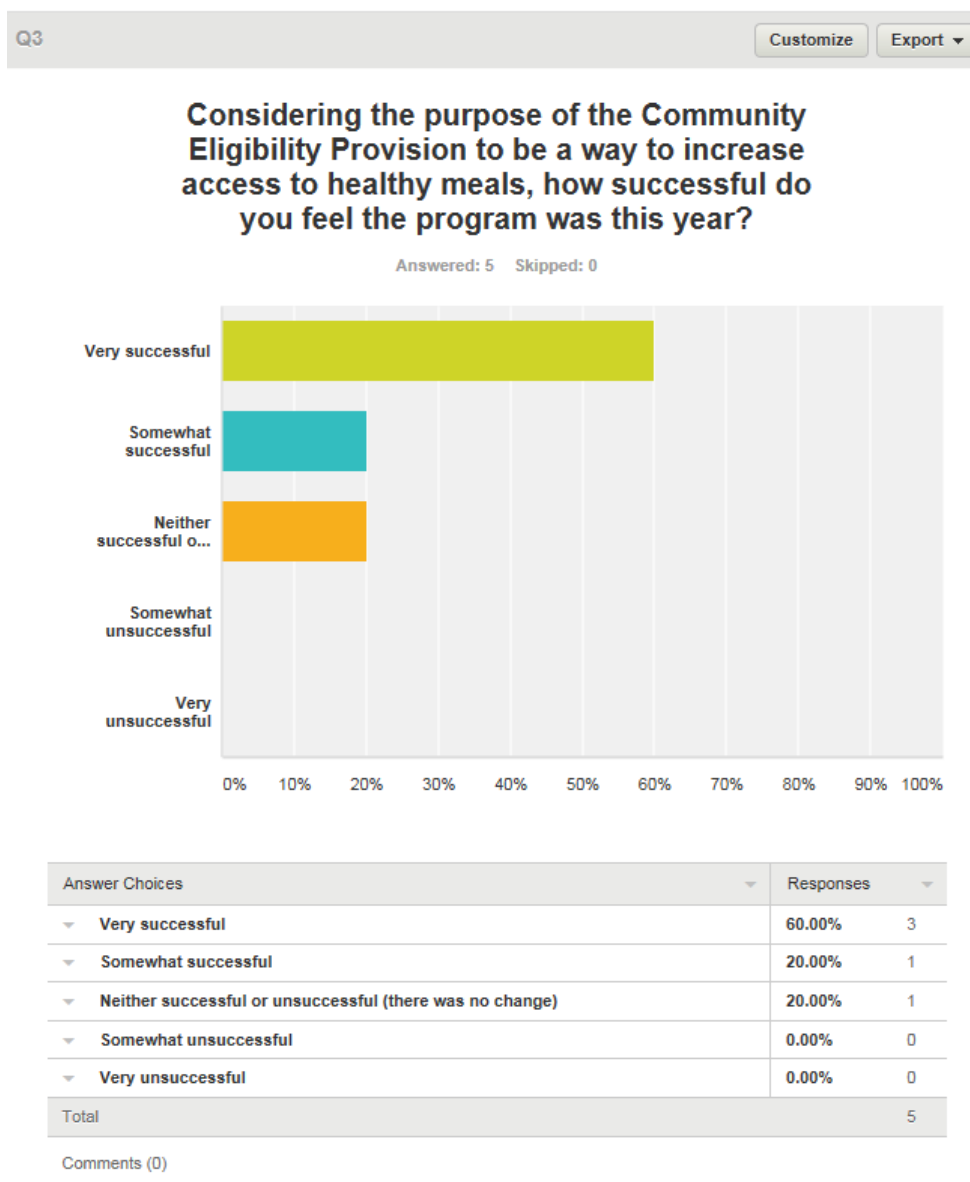
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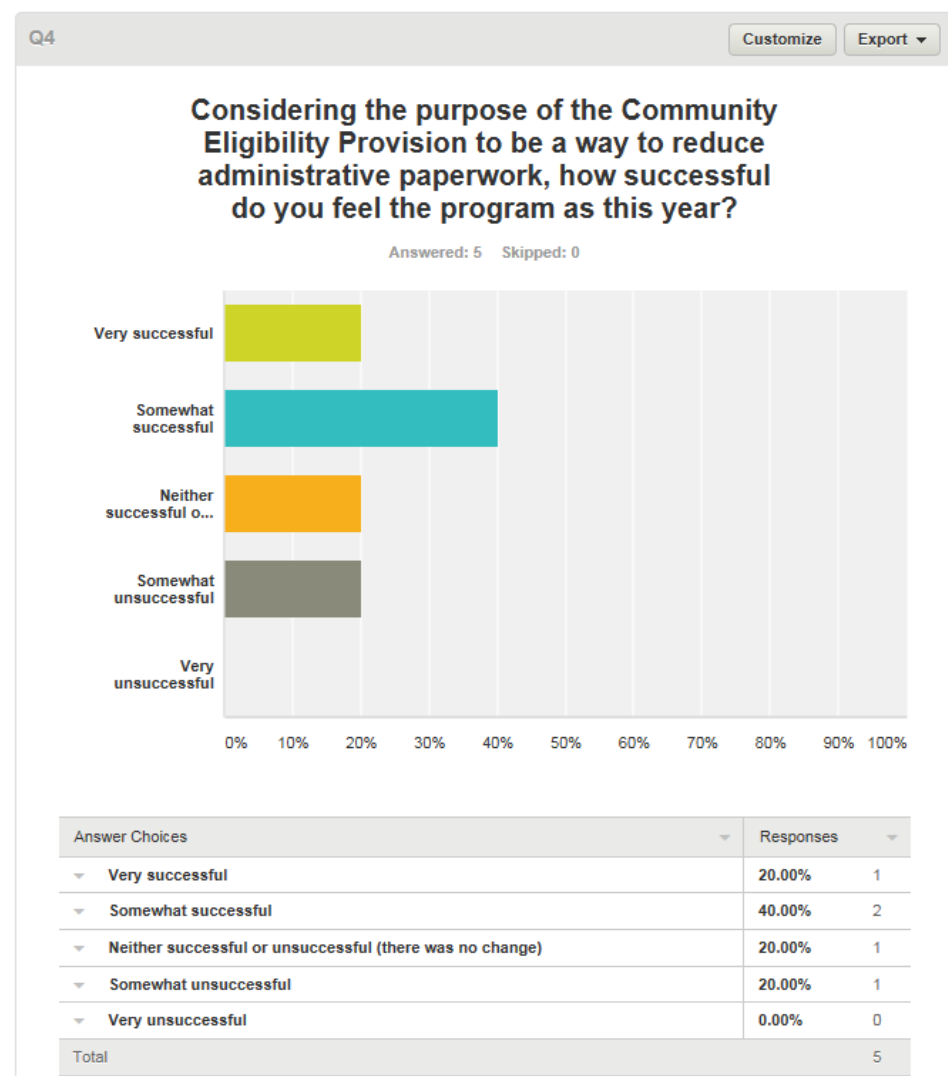
The LEAs cited its greatest concerns being tied to funding issues (lower state/federal funding, as well concerns over at-risk funding and how CEP would impact Title I funds), training staff, and how to handle some schools being eligible for CEP and some not being eligible.



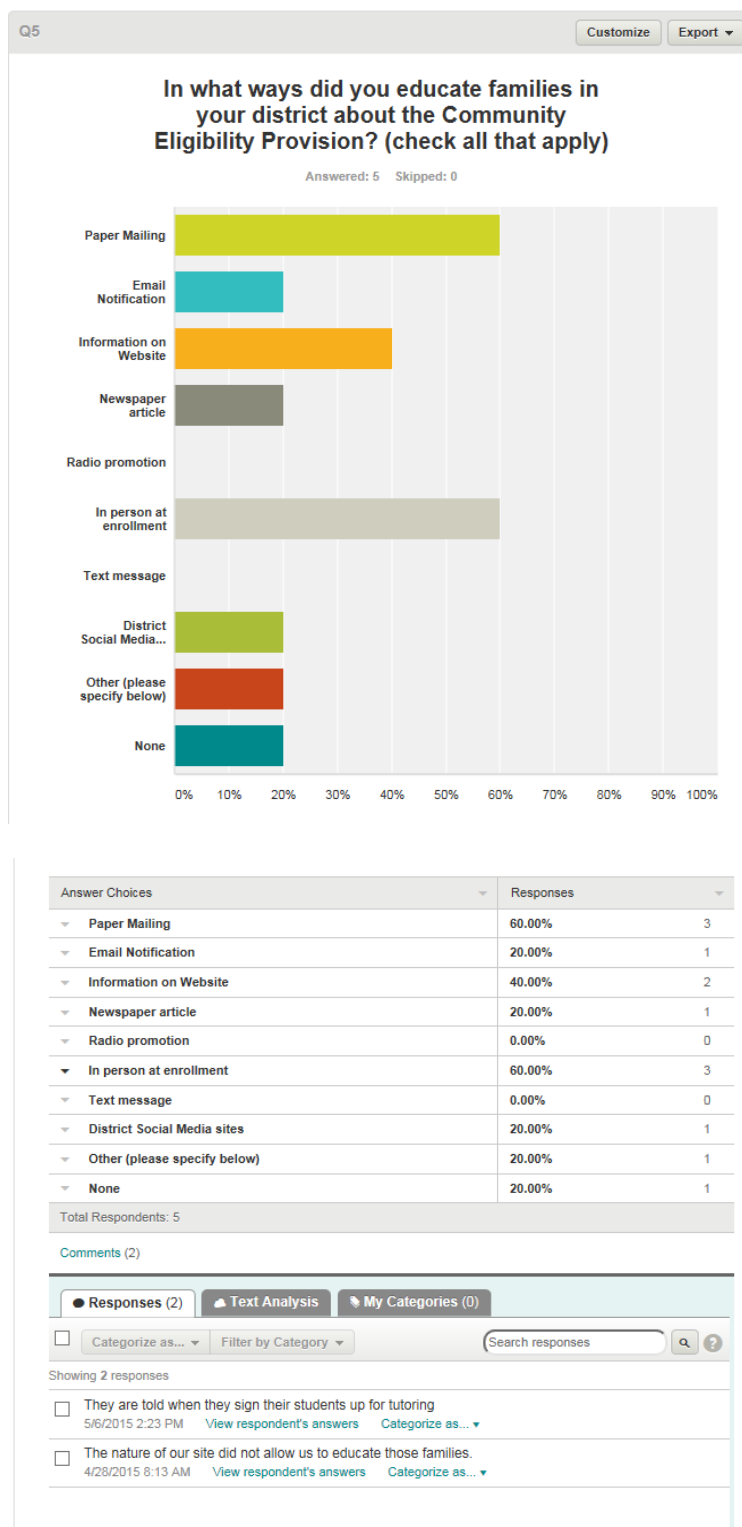
Most LEAs found CEP as a way to increase access to healthy meals.



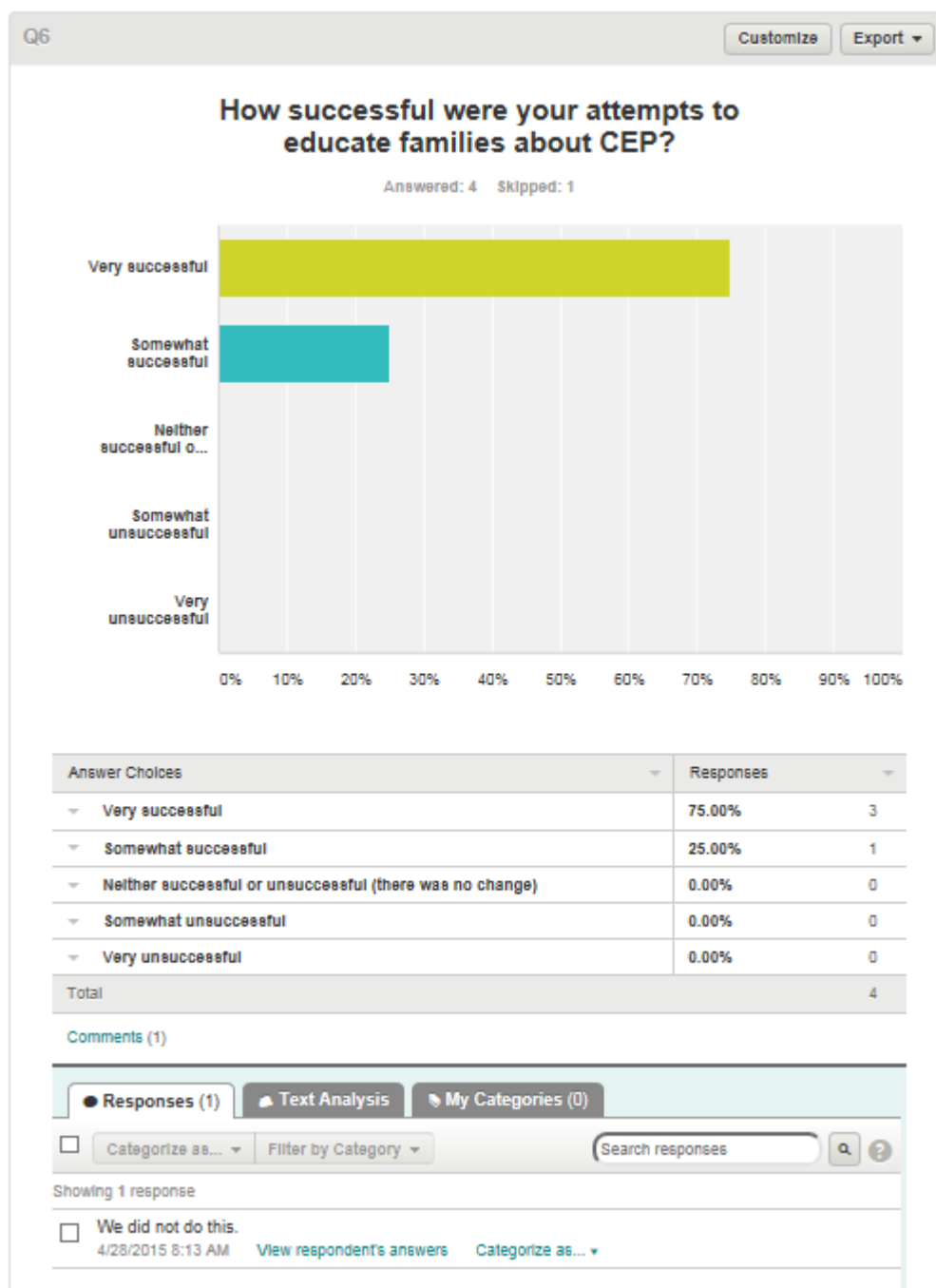
However, districts were split regarding how successful CEP was at reducing administrative paperwork, with some citing it as “very successful” or “somewhat successful”, while others stated that it was “neither successful nor unsuccessful” or “somewhat unsuccessful.”



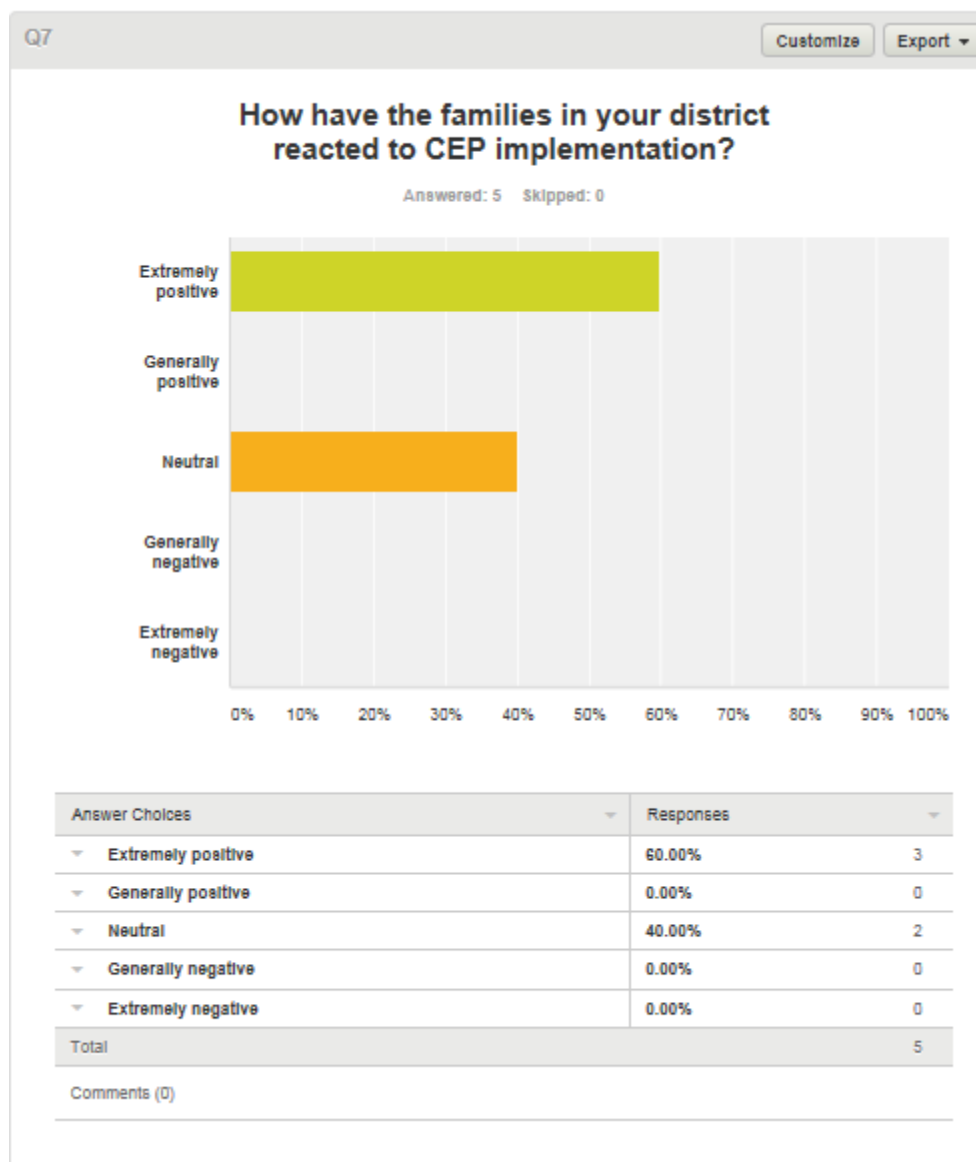
Districts used a variety of methods to educate families regarding the Community Eligibility Provision.



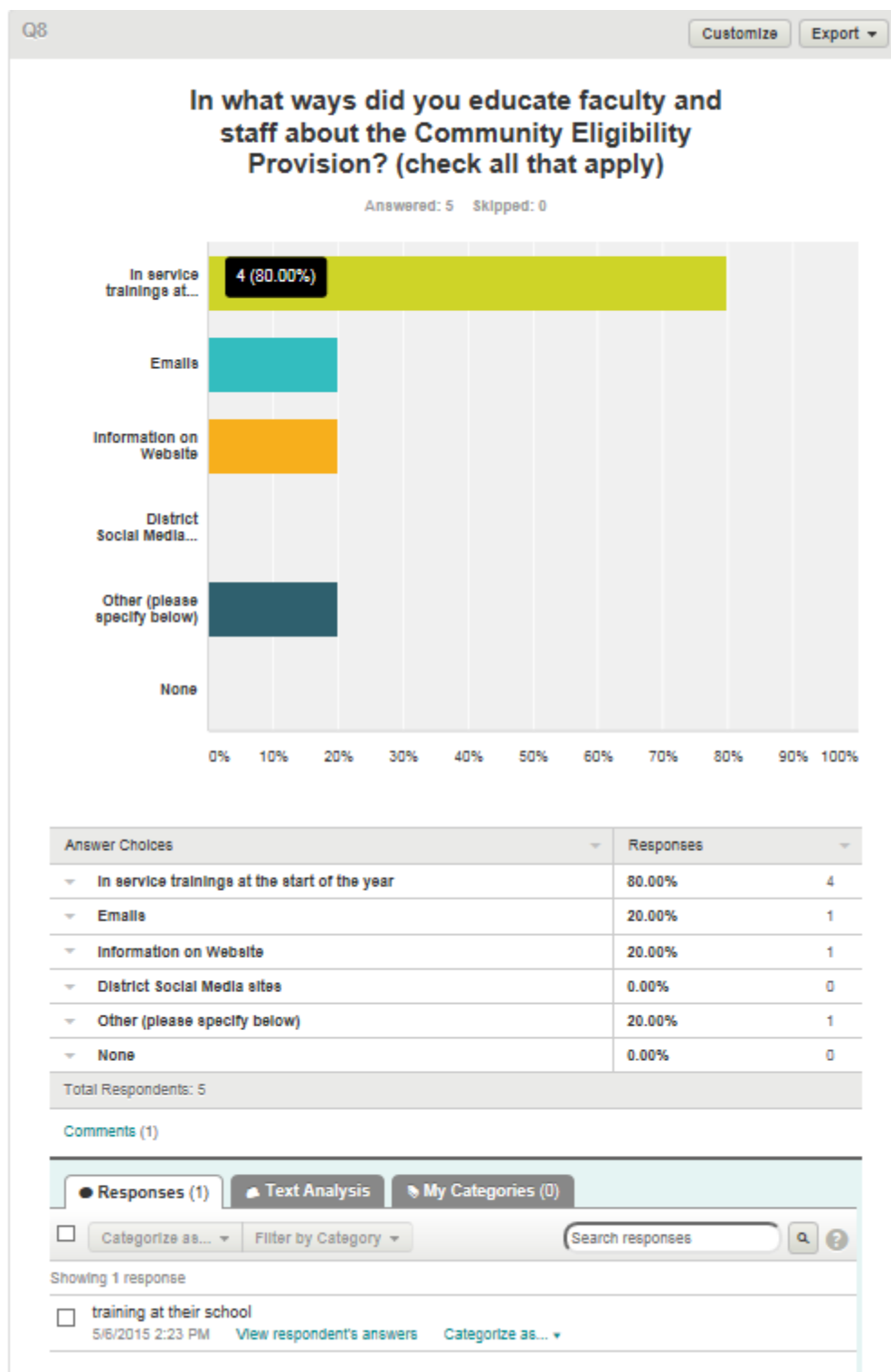
Overall, LEAs felt that attempts to education families about CEP were successful.



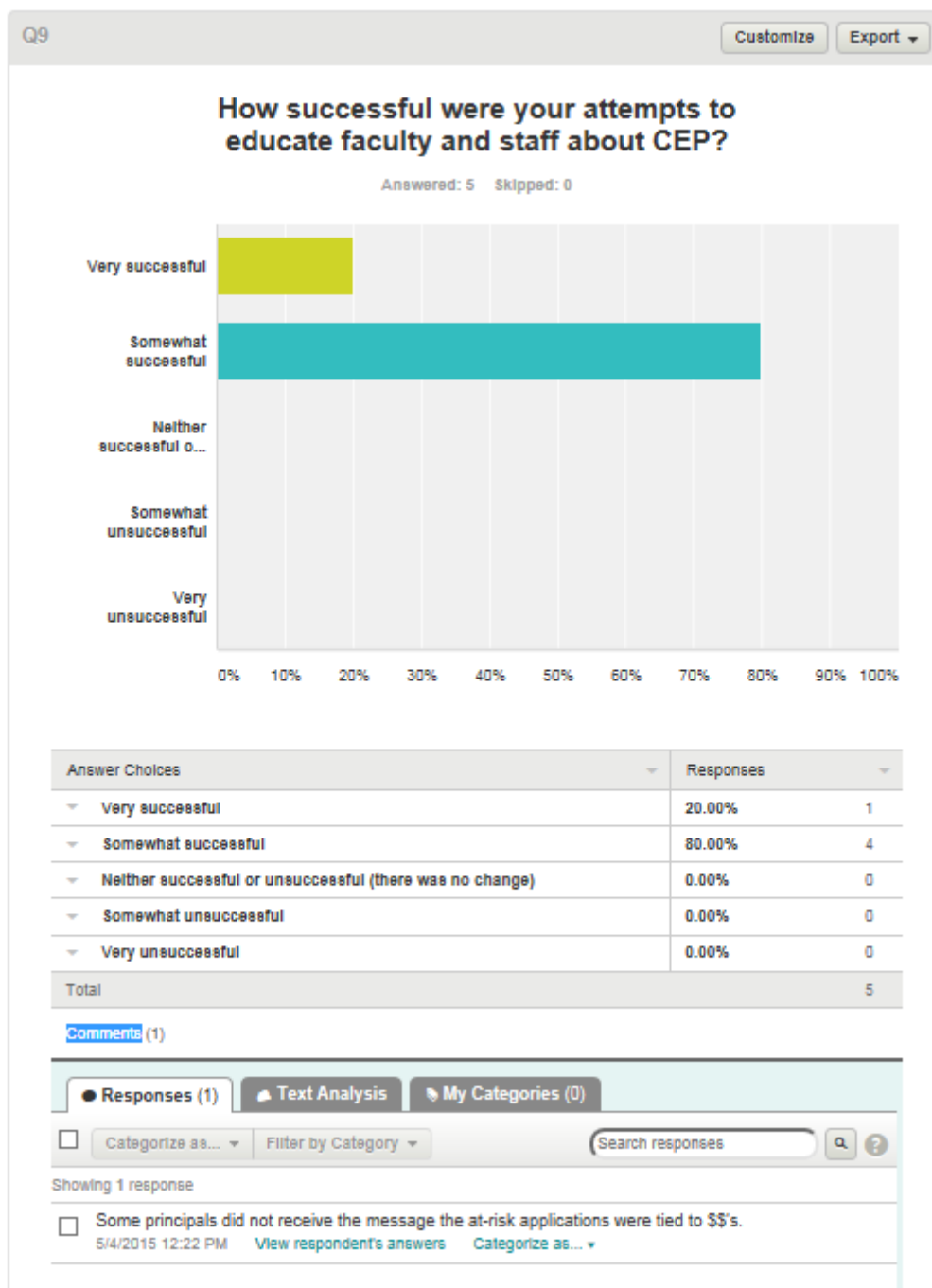
According to school district officials, families either seemed extremely positive about CEP in their schools or they reacted neutrally to CEP.



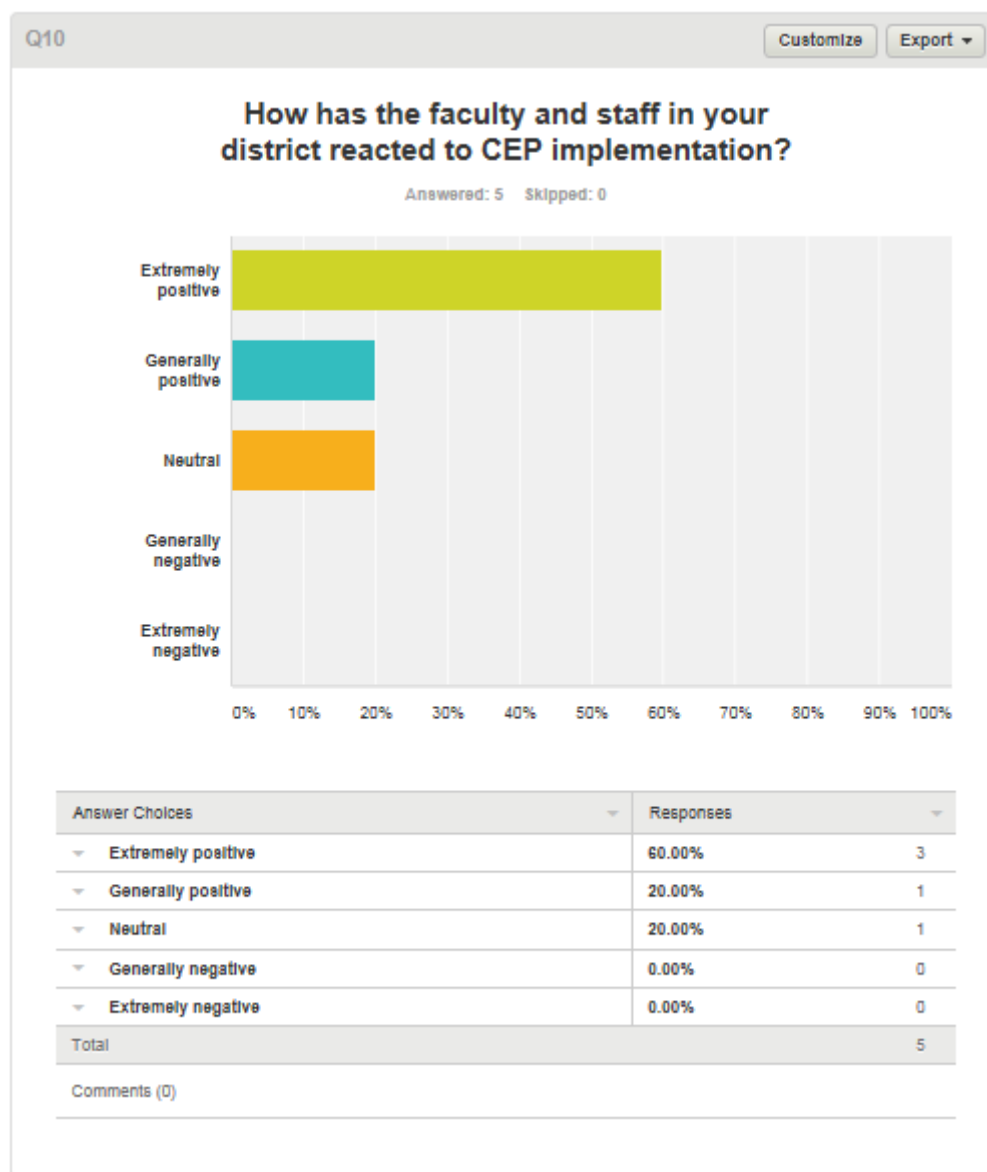
Most districts educated faculty and staff about CEP at in-service trainings, but sponsors also mentioned using emails and websites to increase staff knowledge of CEP.



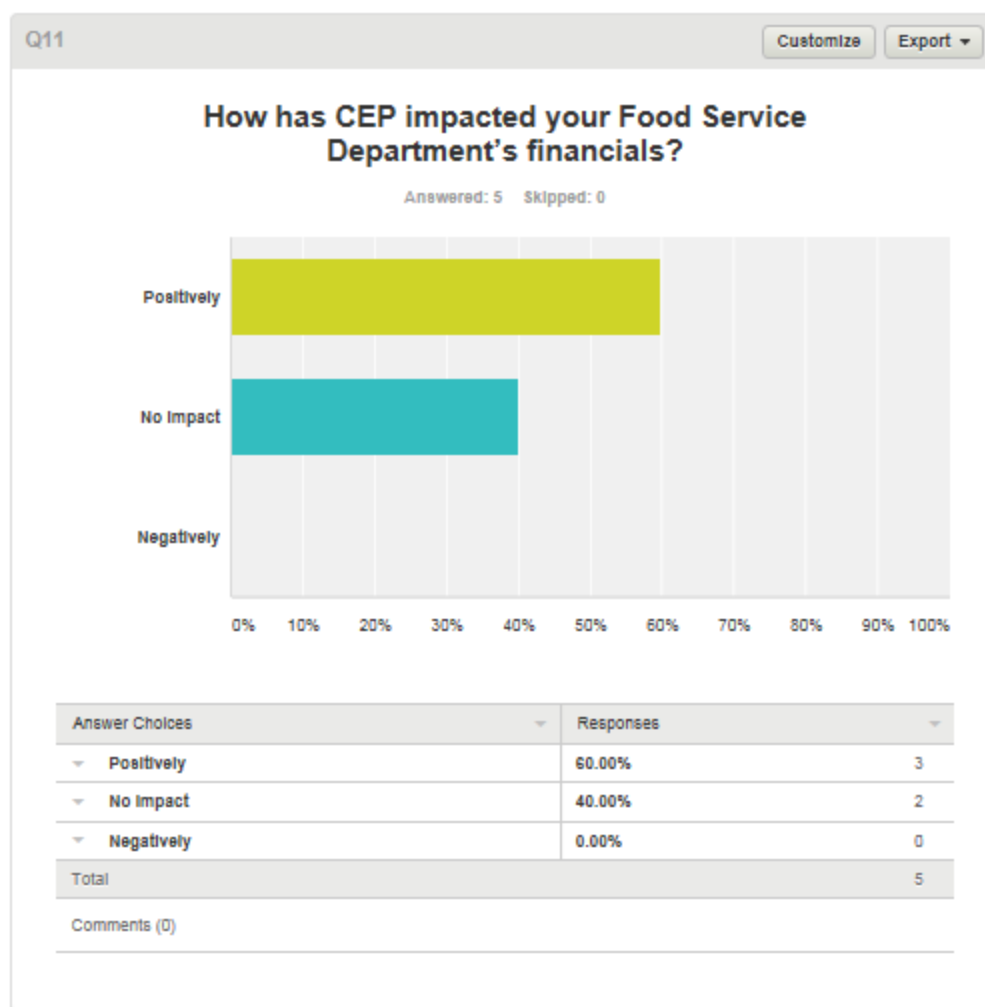
Most districts said that attempts to educate faculty and staff about CEP were somewhat successful, but one district did comment that some district principals did not “receive the message [that] the at-risk applications were tied to \$\$\$ [money/funding].”



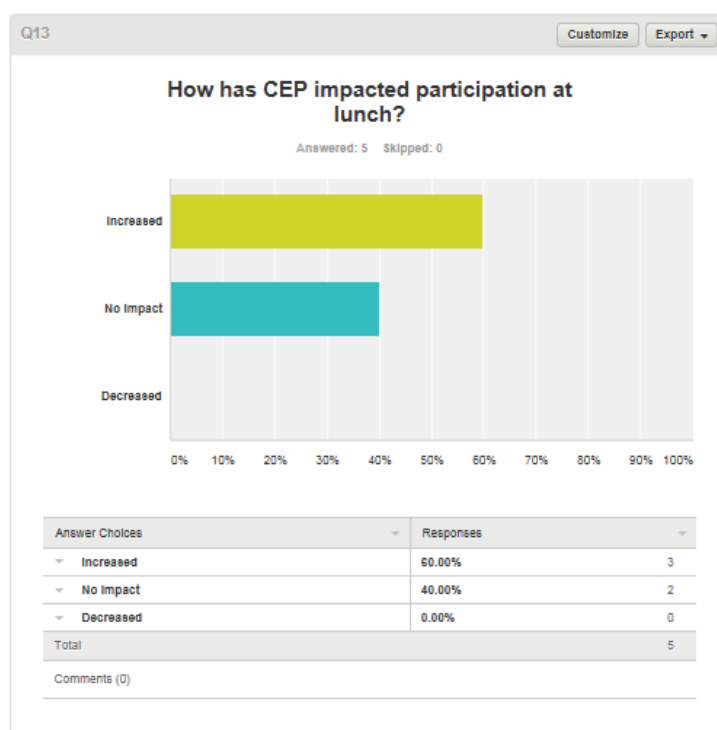
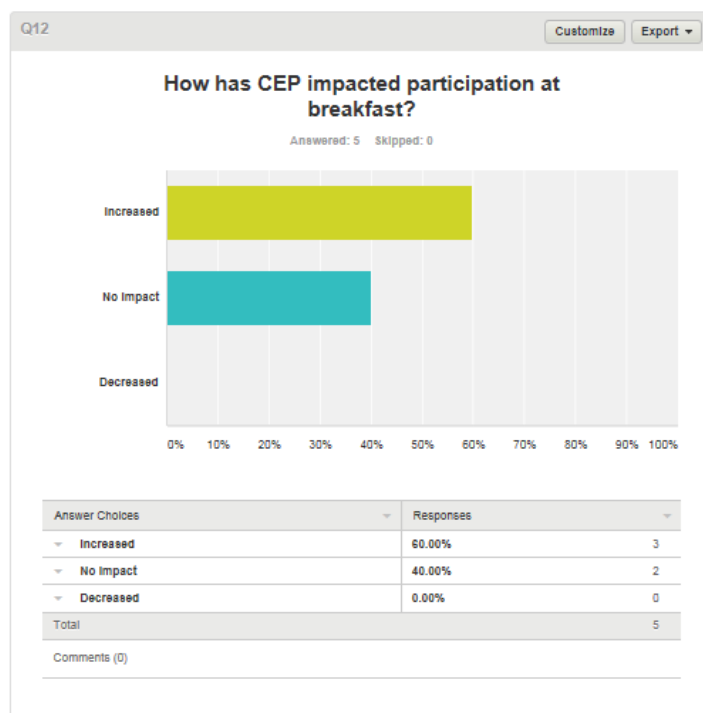
Generally, faculty and staff at CEP districts reacted positively to implementation.



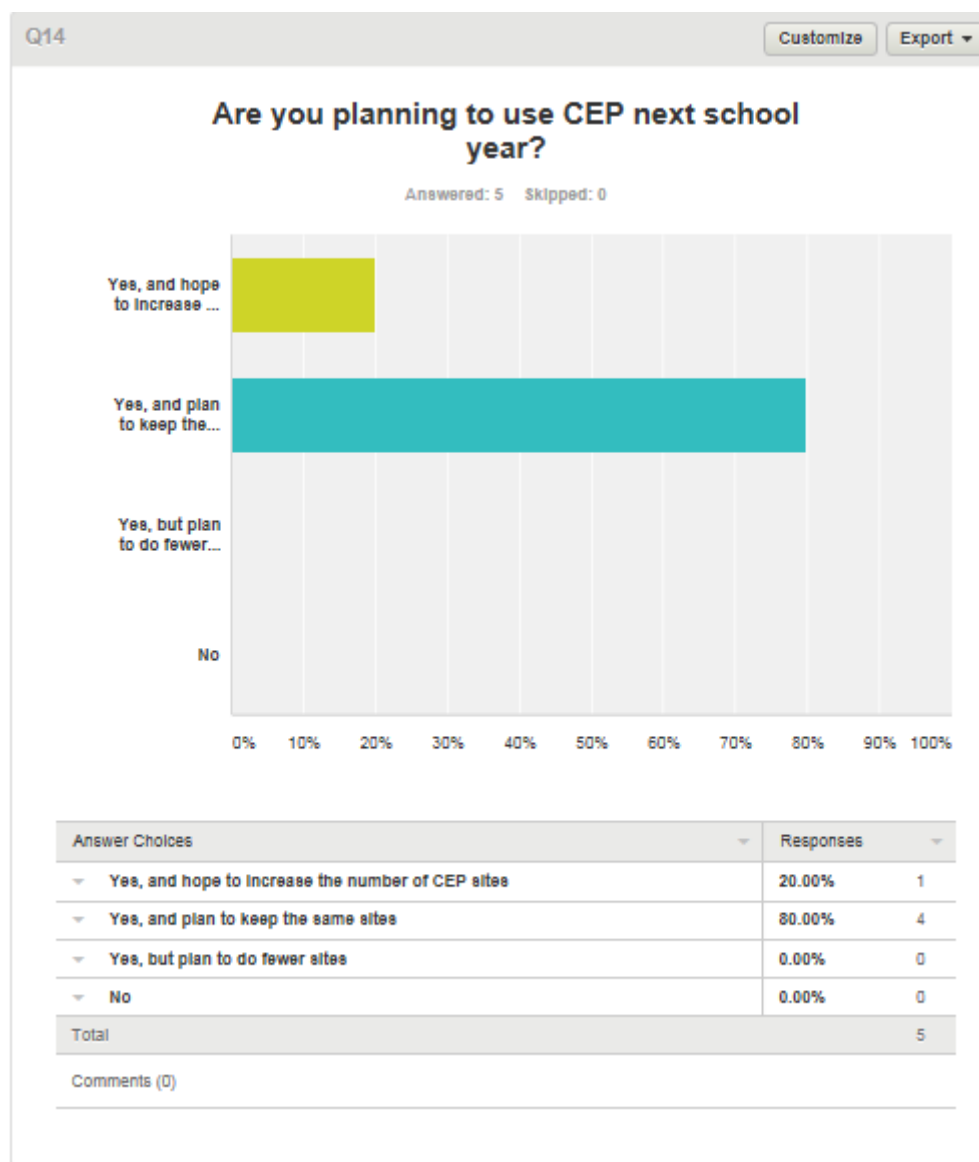
Three districts responded that CEP had a positive impact on the financials of the Food Service Department. Two districts reported no change in Food Service Department financials. No districts said CEP negatively impacted its finances.



Three SFAs indicated that breakfast participation increased under CEP, where two SFAs indicated that there was no change in breakfast participation. The same results held true for lunch participation.



All CEP LEAs indicated that they were planning to keep utilizing the CEP for the next program year. One indicated that they hoped to increase the number of CEP sites.



Only one respondent provided advice to other sponsors in the open-ended question at the end of the survey. They stated “Plan accordingly, breakfast tends to increase more than lunch. Make sure your non CEP office staff is aware of CEP program and make plans for student transfers.”

Q15 Export ▾

What advice would you give to other sponsors who are considering CEP?

Answered: 1 Skipped: 4

● Responses (1) ☁ Text Analysis 🗂 My Categories (0)

☐ Categorize as... ▾ Filter by Category ▾ 🔍 ?

Showing 1 response

☐ Plan accordingly. breakfast tends to increase more than lunch. Make sure your non CEP office staff is aware of CEP program and make plans for if a student transfers.
4/29/2015 8:23 AM [View respondent's answers](#) [Categorize as... ▾](#)

CEP USD 1 INTERVIEW

In a phone interview with the Food Service Director at CEP USD 1, her comments mirror the answers to the survey questions. She said that CEP implementation “went fairly smooth this year. It has increased participation at breakfast and lunch—breakfast more so.” She also stated that “...teachers love it, everyone likes it because there is no fear about being able to eat. It puts people at ease.” However, she expressed concerns over how the use of free/reduced data was tied to so many different facets of education, from grant awards to student test scores to student scholarships for camps and waived fees with the local parks and recreation department. For state at-risk funding purposes, verification of qualification for free meals was still required at the CEP schools. Traditionally, this verification occurs within the context of the USDA’s requirements that are tied to that National School Lunch Program. However, with CEP, verification of applications is not required at CEP schools (because there are no applications to verify). Since the state continued to require verification of student free status (via a household economic survey) at CEP schools, the district was required to verify household income of 3 students at CEP schools. With traditional verification, if a family fails to provide adequate documentation

to demonstrate that they fall within the income eligibility guidelines, the family then loses their free meal qualification, and must then pay full price for their student meals. Since at CEP schools, all students eat at no charge, parents who do not respond to verification have nothing personally to lose (although the district loses its at-risk funding for the student). At CEP USD 1, this resulted in the loss of state at-risk funding for all 3 students selected for verification at the CEP schools.

CEP IMPACT ON STATE AT-RISK FUNDING

As mentioned throughout the study, one major concern that LEAs had regarding implementation of CEP was the impact that it would have on state at-risk funding. At the start of the 2014-2015 school year, the funding formula for Kansas public schools was weighted to take into account the “Kansas At-Risk Pupil Assistance Program.” Through this program, the number of students in a district that are eligible to receive free meals is multiplied by .456 to generate a weighted Full Time Equivalent (FTE). (Kansas State Department of Education, 2014)

The following formula provides the basis for a Local Educational Agency (LEA) to calculate its at-risk funding:

1		2		3		4		5	6	7
Number of Free Meal Students		At-Risk Weighted Amount (round to nearest 0.1)		Weighted FTE		General State Aid Per Pupil Amount		Estimated State At-Risk Funding	2.2% Set Aside	2.2% Set Aside for K-3 Reading Activities
	X	0.456	=		X	3,852	=		0.022	

In Kansas and in other states that have similar funding formulas, the concerns over CEP’s impact on free student data collection was seen as a significant barrier to CEP take-up. Kansas State Department of Education (KSDE) annually collects and reports free and reduced rates at all

schools throughout the state. The following tables show how the free and reduced percentages in the two CEP focus districts changed, both by individual school and by district as a whole.

CEP USD 1	2014-2015			2013-2014			Δ		
	Free	Reduced	F/R	Free	Reduced	F/R	Δ Free	Reduced	Δ Total
District Total	53.48%	7.69%	61.17%	47.27%	7.58%	54.85%	6.21%	0.12%	6.32%
Non CEP D	59.49%	14.60%	74.09%	55.78%	15.65%	71.43%	3.71%	-1.05%	2.66%
Non CEP C	86.50%	8.59%	95.09%	84.38%	5.00%	89.38%	2.13%	3.59%	5.72%
Non CEP B	70.70%	13.38%	84.08%	72.84%	15.02%	87.86%	-2.14%	-1.64%	-3.78%
Non CEP A	44.23%	13.52%	57.75%	47.98%	14.95%	62.93%	-3.75%	-1.43%	-5.18%
CEP 1A	86.42%	5.66%	92.08%	86.54%	5.00%	91.54%	-0.12%	0.66%	0.54%
CEP 1B	80.04%	11.40%	91.45%	83.22%	8.28%	91.50%	-3.18%	3.12%	-0.06%
Non CEP E	29.61%	15.29%	44.90%	29.96%	16.03%	45.99%	-0.35%	-0.74%	-1.09%
Non CEP F	49.52%	15.65%	65.18%	46.69%	16.71%	63.40%	2.83%	-1.06%	1.78%
Non CEP MS	54.81%	12.13%	66.95%	57.16%	11.54%	68.70%	-2.35%	0.60%	-1.75%
Non CEP HS	48.94%	12.38%	61.32%	48.88%	10.95%	59.84%	0.06%	1.43%	1.49%

This first table shows that at CEP USD 1, the district's total free/reduced percentage increased by 6.32 percent. CEP school 1A increased its free and reduced percentage by less than one percent. CEP school 1B had a very slight decrease in free and reduced percentage, which is a result of a decrease in free qualifying students, but an increase in reduced qualifying students. These changes in free and reduced percentage do not differ significantly from the changes in free and reduced percentages at the non-CEP schools within the district. Since at-risk funding is tied to the number of free students specifically, it is important to note that the percentage of free students in district CEP USD 1 increased by 6.21 percent, even though there was a slight decrease in free eligible students at the two CEP schools.

CEP USD 2	2014-2015			2013-2014					
	Free	Reduced	F/R	Free	Reduced	F/R	Δ Free	Δ Reduced	Δ Total
District Total	33.04%	0.89%	33.93%	39.13%	2.01%	41.14%	-6.09%	-1.11%	-7.21%
CEP 2A	77.54%	3.74%	81.28%	91.11%	2.78%	93.89%	-13.57%	0.97%	-12.61%
Non CEP A	69.53%	12.89%	82.42%	69.92%	12.41%	82.33%	-0.39%	0.48%	0.09%
CEP 2B	84.69%	5.10%	89.80%	86.50%	6.75%	93.25%	-1.80%	-1.65%	-3.45%
CEP 2C	84.55%	4.21%	88.76%	90.46%	4.90%	95.37%	-5.91%	-0.69%	-6.60%
CEP 2D	76.75%	4.23%	80.98%	85.21%	7.56%	92.77%	-8.46%	-3.34%	-11.80%
Non CEP B	64.89%	7.63%	72.52%	68.39%	7.74%	76.13%	-3.50%	-0.11%	-3.61%
CEP 2E	74.06%	5.94%	80.00%	82.12%	8.48%	90.61%	-8.06%	-2.55%	-10.61%
Non CEP C	66.02%	6.69%	72.70%	61.02%	10.45%	71.47%	5.00%	-3.77%	1.23%
Non CEP D	62.00%	11.88%	73.87%	63.74%	8.31%	72.06%	-1.75%	3.56%	1.82%
Non CEP E	59.94%	7.95%	67.90%	62.00%	10.86%	72.86%	-2.06%	-2.90%	-4.96%
Non CEP F	60.64%	11.67%	72.31%	65.60%	9.58%	75.18%	-4.96%	2.09%	-2.87%
CEP 2F	76.53%	6.46%	82.99%	76.22%	8.43%	84.65%	0.31%	-1.97%	-1.66%
CEP 2G	81.15%	2.46%	83.61%	91.32%	5.79%	97.11%	-10.17%	-3.33%	-13.50%
Non CEP G	55.41%	7.73%	63.14%	55.56%	6.42%	61.98%	-0.14%	1.31%	1.17%
CEP 2H	78.20%	4.51%	82.71%	88.61%	5.97%	94.58%	-10.41%	-1.46%	-11.87%
CEP 2I	72.93%	7.38%	80.31%	75.60%	8.45%	84.06%	-2.67%	-1.07%	-3.74%
Non CEP H	82.67%	5.18%	87.85%	78.40%	9.67%	88.07%	4.27%	-4.49%	-0.22%
CEP 2J	71.79%	5.98%	77.78%	78.60%	7.78%	86.38%	-6.80%	-1.80%	-8.60%
Non CEP I	55.25%	9.31%	64.55%	54.09%	9.67%	63.75%	1.16%	-0.36%	0.80%
CEP 2K	79.12%	5.94%	85.06%	80.89%	8.87%	89.76%	-1.77%	-2.93%	-4.70%
CEP 2L	85.19%	5.11%	90.30%	87.20%	6.80%	94.00%	-2.01%	-1.69%	-3.70%
Non CEP J	64.20%	13.04%	77.24%	66.60%	9.28%	75.88%	-2.40%	3.76%	1.36%
Non CEP K	62.95%	9.26%	72.21%	63.77%	9.96%	73.73%	-0.83%	-0.69%	-1.52%
Non CEP L	59.83%	10.67%	70.50%	61.05%	10.66%	71.71%	-1.21%	0.01%	-1.20%
Non CEP M	74.63%	7.20%	81.83%	74.04%	6.80%	80.84%	0.59%	0.40%	0.99%
Non CEP N	57.33%	7.88%	65.21%	55.08%	9.73%	64.81%	2.25%	-1.84%	0.40%
Non CEP O	45.16%	8.51%	53.68%	38.37%	8.06%	46.43%	6.80%	0.45%	7.25%
Non CEP P	70.37%	14.81%	85.19%	80.70%	7.02%	87.72%	-10.33%	7.80%	-2.53%

The table for CEP USD 2 shows a very different outcome in the change in free and reduced percentages compared to CEP USD 1. Overall, the district's free and reduced percentage dropped by 7.21 percent. 19 of the district's 28 schools had a reduction in its free and reduced

percentages between the two school years. The district average change in free and reduced percentage was -3.38 percent. However, all but one of the CEP schools had a greater than average decrease compared to the district as a whole. The district's change in free qualified students was -6.09 percent, with an average change of -2.82 percent. 6 out of 12 of the CEP sites showed a larger decrease than the district average. These numbers indicate that the CEP schools were not able to collect the student demographic information necessary to designate many of its students as "free" for the 2014-2015 school year. Based on enrollment figures from the KSDE Headcount Enrollment Report, this change in free at-risk students from school year 2013-2014 to school year 2014-2015 was -873. Using the at-risk funding formula, this decrease of 873 free students calculates out to be an additional 398 FTE students. By taking 398 times the base aid per pupil of \$3,852, it can be estimated that CEP USD 2 lost approximately 1.5 million dollars in funding based on its change in student free/reduced status. Although the changes in free student enrollment at the non-CEP schools indicate that there was a slight reduction that occurred throughout the district in general, it is likely that these changes would not have had as major of an impact on the district's at-risk funding without the influence of the Community Eligibility Provision.

It should be noted that during the start of the 2014-2015 school year, when free and reduced data and enrollment records are being collected and updated, CEP USD 2 suffered from a severe breach of confidential data within the district which resulted in a great deal of negative media attention surrounding the collection of family socioeconomic data. Although it cannot be proven that this impacted household decision making regarding supplying the district with economic information, it could have been an influential factor as to why the CEP schools had difficulty collecting the additional information from its families.

SUMMARY

During the first year the Community Eligibility Provision was available to Kansas Local Educational Agencies as a claiming option for the Child Nutrition Programs, under the Healthy Hunger-Free Kids Act, five LEAs adopted the provision in some manner. Two LEAs adopted CEP sponsor-wide, implementing CEP at its one and only meal service site. One LEA adopted CEP at a specialized school, and otherwise had no other eligible sites. Two LEAs utilized CEP in a select number of its public school buildings. This resulted in 18 schools participating in CEP during the 2014-2015 school year.

Traditional LEAs that adopted CEP saw increases in participation and reimbursement similar to the results that USDA found during its study of CEP. CEP USD 1 saw an increase in average daily participation of 7.7 percent at lunch and 3.2 percent at breakfast. CEP USD 2 saw an increase in average daily participation of 6.4 percent at lunch and 3.4 percent at breakfast. CEP USD 1 saw an increase in reimbursement per meal of \$0.18 and \$0.04 for lunch and breakfast respectively. CEP USD 2 saw an increase of reimbursement per meal of \$0.14 and \$0.03 for breakfast and lunch respectively.

Data indicates that CEP USD 1 did not lose any state funding due to the change in collection procedures for household economic data. However, CEP USD 2 showed a significant decrease in the number of students categorized as “free eligible”, which had a negative impact on its state at-risk funding. Despite this, LEAs that administered the Community Eligibility Provision responded favorably overall to its experience in its first year of implementation and indicated that CEP did increase student access to healthy school meals.

IMPLICATIONS FOR FURTHER RESEARCH

The next step in research regarding CEP in Kansas would involve monitoring participation rates at the current CEP schools. This would show if the increase in participation was sustained over multiple school years, or if the increase in participation was partially due to a novelty effect. It would also be useful to monitor how take up of CEP changes. Depending on how the Kansas Legislature settles its current school funding cases, CEP take up could be dramatically impacted. As indicated in the literature review, at one time, some Kansas schools chose to participate in other provision programs, but did not maintain the election of these provisions for long. It would be of interest to note if CEP continues to be a viable claiming option in Kansas, or if other factors will make it an impractical choice.

Research could also be done regarding how CEP impacts the availability of universal breakfast programs such as breakfast in the classroom. This research could then follow student/class/school test scores to evaluate how having breakfast available to all students for free at the start of the school day impacts student achievement. This aspect of research could be extremely rich from a social policy stand-point. A great amount of research has been done on the impact good nutrition has on academic achievement. Schools that are eligible to participate in CEP are, by design, located in higher poverty areas of the country. By examining how academic achievement in CEP schools change over time as compared to similar schools that choose not to adopt CEP, a better understanding in the role that nutrition plays in education can be gained. In addition to academic achievement, research could be done to examine if universal feeding programs in schools, such as CEP lower rates of negative student behaviors that interfere with learning. CEP research could also play into the public health policy debates. Since eating patterns are often established in childhood, a longitudinal study involving student eating habits as

they grow into adulthood would be of interest. This could also be tied with other current obesity and school meal research.

CONCLUSION

All five LEAs that implemented CEP during the 2014-2015 school year planned to continue using the provision into the 2015-2016 school year. The LEA that had the largest number of CEP schools during the 2014-2015 school year added one additional CEP site for the 2015-2016 school year. An additional five LEAs elected to utilize CEP in some manner during the 2015-2016 school year. Three of these LEAs are small or specialized sites that serve specific at-risk populations. The additional two are significant mid-sized to large school districts within the state of Kansas, one of which elected to use CEP at 40 sites within the school district. There were two large public LEAs that are considered to be good matches for utilizing the Community Eligibility Provision, however, both cited logistical concerns involving not being able to offer CEP at all sites and concerns regarding potential loss in state at-risk funding.

The implementation of this provision comes at a time in our nation's history when social justice issues are becoming more prominent in political and social conversations. Across the nation, research is being done and conversations are being had regarding food deserts and access to healthy food for low-income children. Policy makers are noting that by improving the food quality available to low-income children, it could dramatically reduce obesity and diet related illnesses. The acceptance of the provision on a national level has been surprisingly impressive. Many advocacy groups have been pushing the adoption of CEP, while there has been relatively little negative media coverage arguing that the government should not be paying for these meals. Perhaps this is due to the general societal acceptance of the National School Lunch program and

its free and reduced meal program. Multiple generations have now gone through the educational system with the NSLP in place, so it is likely that it is viewed as just a constant part of the greater public school institution. With the Community Eligibility Provision not dramatically changing the numbers of students receiving discounted meals, but providing a way to catch the small percentage of students who were unable to complete the required paperwork, the program might make its historical mark not as a new policy development, but as a much-needed revision to the most widely-accepted child social welfare program in the county.

Despite the challenges and concerns many LEAs had regarding the adoption of the Community Eligibility Provision, five Kansas sponsors successfully implemented the provision in the first year of its availability. These schools saw an increase in participation and revenue, and most importantly, eliminated the paperwork and stigma attached to applying for free and reduced priced school meals. By removing this barrier, children in high-poverty schools have better access to healthy and nutritious meals. With this decrease in food insecurity, the students are better prepared to learn in school and have a greater opportunity to reach their full potentials.

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